

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA * 4:13-CR-00628-1
VS. * 10:08 a.m.
*
HORTENCIA MEDELES-GARCIA * APRIL 16, 2015

REDACTED TRIAL ON MERITS
BEFORE THE HONORABLE DAVID HITTNER
AND A JURY
Volume 4 of 10 Volumes

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94-15, United States District Court, Southern District of
Texas

14 APPEARANCES:

15 FOR THE UNITED STATES OF AMERICA:

16 Mr. Ruben R. Perez
16 Mr. Joseph C. Magliolo
17 Assistant United States Attorney
17 1000 Louisiana
18 Suite 2300
18 Houston, Texas 77002
(713) 567-9344

FOR THE HORTENSIA MEDELES-GABCTA:

20 Mr. Ali R. Fazel
Scardino and Fazel
21 1004 Congress
Third Floor
22 Houston, Texas 77002
(713) 229-9292

1 **Appearances (continued)**

2 **INTERPRETERS:**

3 Mr. Ramon Del-Villar
4 Ms. Linda Hernandez
5 Ms. Graciela Dachman
6 Mr. Gregorio Ayala

7 Court Reporter:

8 Laura Wells, RPR, RMR, CRR
9 515 Rusk, Suite 8016

10 Houston, Texas 77002

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1 **PROCEEDINGS**

2 THE COURT: Bring in the jury.

3 (Jury entered courtroom at 10:08 a.m.)

4 THE COURT: Be seated, please. We have had a
10:09:13 5 dental request from the jury. We're pleased to
6 accommodate whoever needs to get to the dentist since I
7 spent, what is it, Monday morning with a crown going in
8 before we started in here. So I understand that.

9 So what we're going to do is this: Tomorrow morning
10 we're going to start at 9:00 a.m. Okay. We won't take a
11 formal lunch break, but what we will have is kind of just
12 maybe instead of a 10-minute break a 15-, a 20- or
13 25-minute break, somewhere in there, if you want to bring
14 a quick sandwich or candy bar. We'll adjourn at 2:30 as
10:09:52 15 requested. No problem at all.

16 I will tell you this --

17 Ellen, let me double-check.

18 (Discussion off the record.)

19 THE COURT: The only slight tweaking for all of
10:10:03 20 next week -- all of next week -- is on Tuesday. On
21 Tuesday, we'll get underway at 1:30, at 1:30. Aside from
22 that, we'll go straight 10:00 to 6:00 every day. We'll
23 wrap the case up. It is moving along. We're just going
24 through witness by witness. Thank you for your patience.

10:10:24 25 You don't have to tell your employer you have to be

1 here at 1:30. We don't send that kind of a report to
2 anybody or to a spouse or whatever.

3 (Laughter.)

4 THE COURT: All right. We didn't have to go on
10:10:37 5 the record. We're not on the record. Well, if we're on
6 the record, sobeit. The circuit already understands some
7 of the humor that goes on down here.

8 All right. Ladies and gentlemen, thank you. But
9 bottom line is thank you for your patience. We'll get
10 this case tried. It needs to be tried. We appreciate
11 your attention and the work of the attorneys from both
12 sides. All right.

13 Call your next witness, please.

14 MR. PEREZ: XXXXXXXXXXXXXXXX, Your Honor.

10:11:02 15 THE COURT: Oh, that's right. You need to retake
16 the stand.

17 MR. PEREZ: May I proceed, Your Honor?

18 THE COURT: Yes.

19 XXXXXXXXXXXXXXXX,

20 having been previously duly sworn, testified through the
21 interpreter as follows:

22 **DIRECT EXAMINATION**

23 BY MR. PEREZ:

24 Q. Are you the same XXXXXXXXXXXXXXXX who testified here
10:11:45 25 yesterday, ma'am?

1 **A.** Yes.

2 **Q.** I think yesterday when we broke you had arrived in the
3 United States; is that correct?

4 **A.** Yes.

10:11:52 5 **Q.** Who paid for your trip to the United States?

6 **A.** Joel Sanchez.

7 **Q.** And that was your pimp; is that correct?

8 **A.** Yes.

9 **Q.** When you arrived in the United States, did you work at
10 Las Palmas?

11 **A.** Yes.

12 **Q.** And did you work there in November or December of
13 2010?

14 **A.** Yes.

10:12:18 15 **Q.** Why do you specifically remember those two months that
16 you worked there at Las Palmas?

17 **A.** Because by December 31st I was no longer there.

18 **Q.** And who hired you to work there at Las Palmas?

19 **A.** Juan.

10:12:40 20 **Q.** And Juan was an employee there at Las Palmas?

21 **A.** Yes.

22 **Q.** While you worked there at Las Palmas for November,
23 December, 2010, did you encounter a person that you see
24 here in the courtroom today?

10:12:57 25 **A.** Yes.

1 Q. Can you please point to her and describe what she is
2 wearing for the Court, please.

3 A. (Indicating.)

4 Q. Can you describe or tell the members of the jury and
10:13:12 5 the Court what she is wearing?

6 A. (Speaking Spanish.)

7 Q. Can you describe her for the Court and the members of
8 the jury, please?

9 THE COURT: If you see the witness -- if you see
10 that person in here, tell us what she is wearing or how
11 she looks or -- so we know that you can identify the right
12 person. Point her out if she is here.

13 THE WITNESS: (Indicating.)

14 THE COURT: All right. What color hair does she
10:13:35 15 have?

16 THE WITNESS: Gray.

17 THE COURT: All right. What color blouse is she
18 wearing? What color?

19 THE WITNESS: Black.

20 THE COURT: And what else? No, not jacket. What
21 color blouse?

22 THE WITNESS: May I stand up, please?

23 THE COURT: Yes, please.

24 THE WITNESS: Green and black.

10:14:00 25 THE COURT: All right.

1 MR. PEREZ: May the record reflect this witness
2 has identified the defendant, Your Honor?

3 THE COURT: Yes. The record will so reflect.

4 Q. (By Mr. Perez) When you worked there, did you know
10:14:08 5 her name?

6 A. No.

7 Q. Did you have a name for her, nonetheless?

8 A. Madam Amargada, embittered.

9 Q. Is that how people who worked there knew her as?

10 A. Yes.

11 Q. When you worked there, did you work at Las Palmas as a
12 prostitute?

13 A. Yes.

14 Q. How much did you charge there at Las Palmas?

15 A. \$70.

16 Q. How much did you keep, and how much went to Las
17 Palmas?

18 A. \$50 for me and \$20 for the house.

19 Q. When you say "the house," you mean Las Palmas?

20 A. Yes.

21 Q. And the money that you made, where did that money go?

22 A. I would send it to Joel.

23 Q. And where was Joel at that time?

24 A. In Mexico.

25 Q. You mentioned that you knew that you worked there in

1 December 2010. Does that date have any significance to
2 you?

3 **A.** Can you repeat?

4 **Q.** Yes. Were you pregnant at the time?

10:15:40 5 **A.** Yes.

6 **Q.** And did you deliver a baby sometime thereafter?

7 **A.** Yes.

8 **Q.** Now, when you worked at Las Palmas, from what time to
9 what time did you work there?

10 **A.** There were different schedules during the week. From
11 3:00 in the afternoon to 5:00 a.m. in the week.

12 **Q.** How about on weekends?

13 **A.** During the week we would go in at 5:00 and come out at
14 2:00.

10:16:27 15 **Q.** How many girls would work there at one time? Let's
16 say a typical Saturday night, how many girls were there
17 working, approximately, if you know?

18 **A.** About 27.

19 **Q.** How about Friday night, typical Friday night?

10:16:50 20 **A.** Most of us worked every day. There was only one day
21 of rest.

22 **Q.** What day of rest was that?

23 **A.** They closed on Tuesdays.

24 **Q.** And as far as you know, all the girls had to pay what
10:17:06 25 you paid, like \$20, for each sex act to Las Palmas?

1 **A.** Yes.

2 **Q.** I'm going to show you a picture on the board. Okay.

3 I'm going to ask you if you can identify these people.

4 P-32, can you identify that person? I guess you

10:17:45 5 identified her earlier today as Senora Amargada or the

6 Bitter Woman?

7 **A.** Yes.

8 **Q.** P-34?

9 **A.** That's Odelia.

10 **Q.** What was her job there at Las Palmas?

11 **A.** She worked at the bar.

12 **Q.** Did you ever tell her that you were here in this

13 country illegally?

14 **A.** Yes.

10:18:11 15 **Q.** And, in fact, based on what you observed there at Las
16 Palmas, were most people there who were there or worked
17 there were they illegally in the country --

18 MR. FAZEL: Judge, objection to speculation.

19 **Q.** (By Mr. Perez) -- if you know? I haven't finished my
10:18:25 20 question. If you know.

21 **A.** Yes.

22 **Q.** Did you meet girls there at Las Palmas who you had met
23 in Mexico who had worked as prostitutes?

24 **A.** Yes.

10:18:37 25 **Q.** And did you know whether those girls who you had met

1 in Mexico and worked at Las Palmas, did you know they had
2 pimps like you did?

3 **A.** Yes.

4 **Q.** They had pimps here in the United States, as well?

10:18:52 5 **A.** I don't know.

6 **Q.** Okay. But you knew they had pimps in Mexico?

7 **A.** Yes.

8 **Q.** Now, you worked there at Las Palmas; and who made the
9 arrangements for you to work? I know that Juan hired you,
10 but who made the arrangements for you to go to Las Palmas
11 to work?

12 **A.** Claudio Sanchez told me to go.

13 **Q.** Now, who was Claudio Sanchez again?

14 **A.** He is Joel Sanchez' brother, my ex-brother-in-law.

10:19:31 15 **Q.** Ex-brother-in-law of your pimp?

16 **A.** No. Mine.

17 **Q.** Okay. Your ex-brother-in-law?

18 **A.** Yes.

19 **Q.** Proceed, please.

10:19:47 20 **A.** When he said we should go, he said we should go and
21 introduce ourselves to Juan. He said we should tell him
22 that we came directed by XXXXXXXX or XXXXXX. I don't
23 quite recall the name. Then he said hang on for a few
24 minutes. And then he went to use the phone.

25 THE COURT: Can everybody hear all right?

1 MR. FAZEL: I can hear her.

2 THE COURT: Can everybody hear all right?

3 THE JURORS: (Nodding heads up and down.)

4 THE COURT: Okay. I just wanted to make sure.

10:20:29 5 Okay. Sorry. Go on.

6 Q. (By Mr. Perez) Who went to use the phone? Who went
7 to -- you said that you approached Juan and that then he
8 said "wait a minute" and he went to use the phone. Is
9 that the Juan that you had the interview with?

10:20:45 10 A. Juan, yes. When he finished talking on the phone, he
11 came back. And he said, yes, we have the job.

12 Q. Let me ask you this, ma'am: You are working there at
13 Las Palmas. Why did you work there at Las Palmas for your
14 pimp? Why didn't you just escape? Tell that to the
15 members of the jury, please, ma'am.

16 A. Because they were threatening my daughter.

17 Q. Explain that. What daughter?

18 A. I had a daughter in Mexico. Her name is Jaime. Joel
19 threatened me that if I didn't work for him I would never
20 see her again.

21 Q. Before arriving in the United States had you had a
22 forced abortion then?

23 A. Yes.

24 Q. Briefly explain that to the members of the jury.

10:22:06 25 A. When I told Joel I was pregnant, he said I couldn't

1 have that child. He said we were going to travel to the
2 United States, and we would be burdened. So he took me to
3 a doctor. They gave me some shots, and I lost my baby
4 right there.

10:22:39 5 **Q.** Later, did you have a daughter?

6 **A.** Yes. I had my daughter later.

7 **Q.** And that's the one that he used to threaten you with?

8 **A.** Yes.

9 **Q.** At some point -- at some point did -- you said you
10 left Las Palmas in December of 2010?

11 **A.** Yes.

12 **Q.** Where did you go?

13 **A.** With my cousin.

14 **Q.** And how was it that you were able to leave that
15 location?

16 **A.** Because before leaving, Joel took me again to the same
17 doctor so that I would again lose my baby. The doctor
18 said I should rest. But then he said, you know what, in
19 two days you have to leave for the U.S.

10:23:47 20 **Q.** Who told you you had to leave for the United States?

21 **A.** Joel Sanchez.

22 **Q.** So what happened?

23 **A.** I came with his brothers. When we arrived at the --
24 where the policeman was, he stopped me; and I said -- he
10:24:13 25 asked me where we were going. I said, "I'm going to the

1 border, here." But when he stopped me, my brothers-in-law
2 said I shouldn't say I was going with them.

3 Then the policeman in Mexico said I had to give them
4 money for their lunch and that they would let me go. I
5 don't -- I think I gave them maybe 500 dollars -- pesos.

6 THE COURT: How much is 500 pesos, by the way, in
7 American dollars?

8 THE MARSHAL: It's 12 to one.

9 THE COURT: 12 to 1. Okay.

10 Q. (By Mr. Perez) Okay.

11 A. Then they let me get on the bus again. We crossed the
12 river.

13 Q. How did you cross the river, ma'am?

14 A. (Motioning.)

15 Q. How did you cross the river? In the bus?

16 A. No. We crossed it swimming. Then we walked about 15
17 minutes, and a car was waiting for us. The car took us to
18 a house, and we stayed in that house for about two weeks.
19 They were going to take us by car but there were too many
20 people and there was no room for us. We had to wait for
21 more than a month. But that night they were going to go
22 on foot and asked us if we wanted to go on foot.

23 Q. Did you agree to that?

24 A. Sorry?

25 Q. Did you agree to go by foot?

1 **A.** We agreed to go. I don't remember exactly, but there
2 were about 20 of us. And we started crossing -- going
3 around to the checkpoint in the brush. I was not feeling
4 well because of my pregnancy.

10:26:39 **Q.** Did you know you were pregnant at that time?

6 **A.** Yes. I don't know what pills they gave me, but they
7 did so that I could tolerate the walk better. And then we
8 walked about 12 hours. I don't remember exactly how many.
9 We arrived at a house in Houston. They kept us there for
10 about a day. Then they left us where Fiesta meets Airline
11 and 45. And then Joel Sanchez' brother picked us up
12 there, Reymundo Sanchez.

13 **Q.** From there where did you go?

14 **A.** Then they took us to the apartment he had already
15 rented. And after two days they went to buy us clothes;
16 and then, they sent us to work at El Diamante.

17 **Q.** How long did you work at El Diamante?

18 **A.** Two weeks. I don't remember.

19 **Q.** And from there did you go somewhere else?

10:28:18 **A.** Claudio saw that we weren't making any money. That's
20 when he sent us to Las Palmas.

22 **Q.** So there wasn't too much money being made at the
23 Diamante; is that right?

24 **A.** No. We were working at Las Palmas, but on the road
10:28:48 25 Alejandra -- (Speaking Spanish.)

1 MR. FAZEL: I'm sorry, Your Honor. I object.

2 It's narrative. Also, she is going into hearsay.

3 THE COURT: What?

4 MR. FAZEL: It is also going into hearsay.

10:28:59 5 THE COURT: Well, it's narrative for right now.

6 Question, please.

7 Q. (By Mr. Perez) You were on your way to Las Palmas.

8 You mentioned something about Alejandra. Who is

9 Alejandra?

10:29:08 10 A. She is Claudio Sanchez' wife.

11 Q. Well, did she say "wife" or did she say "woman"?

12 THE INTERPRETER: I'm sorry, sir. In Spanish it
13 could be "wife" or "woman."

14 MR. PEREZ: That's why I'm asking. Did she mean
15 "wife" or "woman"?

16 A. No. (Speaking Spanish.)

17 Q. (By Mr. Perez) No what?

18 THE INTERPRETER: She said when we were coming
19 I --

10:29:39 20 MR. FAZEL: Objection.

21 THE COURT: Hold it. Hold it. Hold it. Yes,
22 sir.

23 THE INTERPRETER: All right.

24 MR. FAZEL: Objection, nonresponsive, Your Honor.

10:29:45 25 The witness is being nonresponsive.

1 THE COURT: Okay. I'll take your word for it.

2 All right. If it's not responsive, you know, ask the
3 questions and try to make it yes or no or correct or not.

4 MR. PEREZ: Your Honor, I'm just trying to figure
10:30:00 5 out when she said --

6 THE COURT: I understand when she said "woman"
7 did she mean the man's wife or just a female. All right.

8 MR. PEREZ: Okay.

9 THE COURT: What word was used, "woman" or
10:30:12 10 "wife"?

11 THE WITNESS: Wife.

12 THE COURT: Okay.

13 Q. (By Mr. Perez) So then what happened, ma'am?

14 A. She asked -- Alejandra asked, "Who are you?"

15 And I said, "Joel Sanchez' wife."

16 She said, "You are not Joel Sanchez' wife."

17 And I said, "I am. I married him."

18 And she said, "No, you are not. I know another one."

19 Then I told her, "You know what, I don't know you as
10:30:58 20 Claudio's wife either." I said, "When we arrive, you and
21 I are going to talk."

22 Q. And when you arrived, did you talk?

23 A. Yes. And she asked me, "Do you remember Anna?"

24 And I said, "Yes, Joel's sister-in-law."

25 And then she said, "No. That's not his sister-in-law."

1 It's his wife."

2 And I was surprised because I had been living with
3 Joel for five years.

4 **Q.** For those five years, approximate five years had you
10:31:39 5 been -- had he been your pimp?

6 **A.** Yes. And she would talk to me, and she told me. And
7 supposedly she was his sister-in-law. She said the
8 children that he introduced to you as his nephews, they
9 are his children. When one day when I found out all this
10 when I was working at Las Palmas, I said that I wasn't
11 feeling well.

12 **Q.** You told that to whom?

13 **A.** To Joel.

14 **Q.** And he is in Mexico; is that right?

15 **A.** Yes. I said -- he asked, "What is wrong?"

16 And I said, "It's the baby. It doesn't want to get
17 ready to come out."

18 He asked, "Are you sure you are not feeling well?"

19 And I said, "Yes."

20 And I called my cousin and asked, "Can you come and
21 get me?"

22 But I didn't say anything to Claudio or the other
23 brothers.

24 **Q.** And the other brothers were also pimps, right?

25 **A.** Yes. Then she came; and Mia came, also.

1 Mia said, "Where are you going?"

2 I said, "I'm going with my cousin."

3 And he said, "No. You are not going to leave."

4 THE COURT: Now, where was this? In the United
10:33:29 5 States or Mexico?

6 MR. PEREZ: In the United States, Your Honor.

7 THE COURT: All right. I just want to confirm.
8 Move along, please.

9 THE WITNESS: In Mexico.

10 THE COURT: It was in Mexico, correct?

11 THE WITNESS: In the United States.

12 THE COURT: Let's go. Move it along.

13 MR. PEREZ: Okay.

14 THE WITNESS: (Speaking Spanish.)

10:33:43 15 THE COURT: The next question, please.

16 MR. PEREZ: Okay.

17 THE COURT: Next question. Let's move it,
18 Counsel.

19 MR. PEREZ: Okay. Yes, Your Honor.

10:33:49 20 Q. (By Mr. Perez) You are in the United States; but Joel
21 is in Mexico, right?

22 A. (Nodding head up and down.)

23 Q. You left that Las Palmas, right?

24 A. Yes.

10:33:57 25 Q. Where did you go?

1 **A.** With my cousin.

2 **Q.** Did you get permission from Joel to go to your
3 cousin's house?

4 **A.** Yes. So she would check me.

10:34:11 5 **Q.** Okay. And did you ever return back to Las Palmas
6 after you left?

7 **A.** No, because it was all a lie. I wasn't feeling bad.
8 It was just something so that I could get out of there.

9 **Q.** Did you eventually contact law enforcement or the
10 police about your situation?

11 **A.** Can you repeat the question?

12 **Q.** After you left under this rouse about saying that you
13 were feeling bad, did you contact the police?

14 **A.** No. I met the man who is my husband now, Marlo
15 Hernandez. I met him through the internet.

16 **Q.** After you met your current husband, did you then
17 contact the police?

18 **A.** Yes. He said that what had been done to me was not a
19 man's thing. He started looking for help to see what I
20 could do. Then the number where you could make a report
21 appeared. And he got it, gave it to me and said, "Here.
22 Call." And after two days, I made a decision to call.

23 **Q.** Why did you hesitate for two days to call the police?

24 **A.** Because I was afraid for my daughter. Then I called,
25 and a young woman answered and said an official -- an

1 officer will call you. And then a few minutes later,
2 Mr. Edwin called me.

3 **Q.** And Edwin, is that the fellow sitting behind me?

4 **A.** Yes. Yes.

10:36:10 5 **Q.** What happened after you made contact with Edwin?

6 **A.** He asked me if we could get together because he was
7 interested in hearing what I had to say. He asked for me
8 to choose a place where I would feel comfortable.

9 **Q.** What place did you choose, if you did?

10 **A.** I chose the McDonald's on Veterans Memorial. I told
11 him I would go with Marlo, and he said he would have
12 another gentleman accompanying him. He said I shouldn't
13 worry because if he wasn't interested in my case he was
14 not going to call immigration. He would just leave, and I
15 could go my own way.

16 **Q.** And did you, in fact, meet with Edwin?

17 **A.** Yes.

18 **Q.** At the McDonald's?

19 **A.** Before arriving at the McDonald's he told me that. We
20 got to McDonald's. I started telling him what happened to
21 me. And he said that my report would --

22 MR. FAZEL: Objection, Your Honor. She is --

23 THE COURT: Hold it. Hold it. Yes, sir.

24 MR. FAZEL: She is going into hearsay what the
25 officer told her at a meeting. I object to that.

1 THE COURT: Sustained.

2 THE INTERPRETER: Please use the microphone.

3 MR. FAZEL: I'm sorry.

4 THE COURT: All right. Next question, please.

10:37:52 5 Let's go question and answer.

6 MR. PEREZ: Okay. Yes, Your Honor.

7 Q. (By Mr. Perez) You did meet with Edwin, right?

8 A. Yes.

9 Q. You did tell him your story?

10:38:01 10 A. Yes.

11 Q. About how you were a prostitute?

12 A. Yes.

13 Q. Did you tell him that you had worked at Las Palmas?

14 A. Yes.

15 Q. And after you talked to him, what happened to you?

16 A. After I talked to him, he asked me to take him to the
17 places where we lived. The next day we got together so I
18 could take him where I lived. I showed him where they
19 picked up the girls, the other girls. And I showed him
20 where the men picked up the tanda.

21 Q. Did you also show him or discuss Las Palmas with him?

22 A. Yes.

23 Q. What happened after the second day that you met with
24 him?

10:39:01 25 A. I don't remember exactly.

1 Q. Okay. What happened after that, after meeting him and
2 showing him the locations with Edwin?

3 **A.** (Speaking Spanish.)

4 | Q. Take your time.

10:39:27 5 THE INTERPRETER: She said, "I don't remember."

6 **A.** I don't remember exactly where, but he took me to the
7 YMCA.

8 Q. (By Mr. Perez) What happened at the YMCA?

9 **A.** He took me to see Ms. Constance. I told her

10 everything that happened to me, and they started helping
11 me. And thanks to them, I came out of that.

12 MR. PEREZ: May I have a moment, Your Honor?

13 THE COURT: Yes, sir.

14 (Sotto voce discussion between counsel.)

10:40:31 15 Q. (By Mr. Perez) During the time you worked at Las
16 Palmas, you said you worked there every day except for
17 Tuesdays?

18 | A. Yes.

19 Q. Let's say on the weeknights, how many men do you think
10:40:46 20 you serviced per night during the weeknights?

21 | **A.** Daily was about 20.

22 Q. How about on the weekends, Friday night, Saturday
23 night and Sunday night?

24 | A. 30.

10:41:10 25 Q. And who provided the condoms for each sex act there at

1 Las Palmas?

2 **A.** There was a man upstairs where the rooms were. He had
3 to be paid, and he would give us the condoms.

4 **Q.** How much did you pay him per condom?

10:41:31 5 **A.** It was \$20 for everything.

6 **Q.** And when you say \$20 for everything, explain that to
7 the members of the jury, please.

8 **A.** \$20 for the room and the condom.

9 **Q.** Did you see some young girls, who appeared to be young
10 to you, working there at Las Palmas during the time you
11 worked there?

12 **A.** Yes.

13 **Q.** You say young. How -- based on your experience, about
14 how young do you think they were?

10:42:06 15 MR. FAZEL: Judge, I'm going to object to
16 speculation.

17 MR. PEREZ: Again, if you know. If she knows.

18 THE COURT: All right.

19 **A.** Maybe 17, 18.

20 **Q.** (By Mr. Perez) Anyone younger than that, if you know?

21 MR. FAZEL: Asked and answered, Your Honor.

22 THE COURT: Overruled.

23 MR. PEREZ: Okay.

24 MR. MAGLIOLO: It's overruled. You can ask.

25 **A.** I don't remember.

1 MR. PEREZ: I'll pass the witness, Your Honor.

2 MR. FAZEL: May I proceed, Your Honor?

3 THE COURT: Yes, sir.

4 **CROSS-EXAMINATION**

10:42:34 5 BY MR. FAZEL:

6 Q. Good morning, ma'am. My name is Ali Fazel. I don't
7 think you and I have ever met before, have we?

8 A. No.

9 Q. I want to just briefly talk about your trip from your
10 home country to Mexico and then from Mexico to the U.S.
11 and then we'll focus on the U.S. Okay?

12 A. Okay.

13 Q. If I ask you a question that's too fast, tell me you
14 don't understand; and I'll repeat myself. Okay?

10:43:00 15 A. Okay.

16 Q. You are from what country?

17 A. Honduras.

18 Q. And then, you left Honduras at what age?

19 A. About 18.

20 Q. When you left Honduras, you already had a child,
21 correct?

22 A. Yes.

23 Q. Then you left because you wanted to make more money?

24 A. Yes.

25 Q. You left to come to the United States to do that?

1 **A.** Yes.

2 **Q.** But you actually had to stop at Guatemala, if I'm not
3 mistaken, because somebody had lied to you, a family
4 member lied to you, correct?

10:43:35 5 **A.** Yes.

6 **Q.** There you worked at a cantina or a restaurant,
7 correct?

8 **A.** A cantina.

9 **Q.** Correct?

10:43:44 10 **A.** Yes.

11 **Q.** And at some point in time something occurred; and
12 then, you decided you wanted to go to Mexico, correct?

13 **A.** Yes.

14 **Q.** This is the part I'm confused about. When you arrived
15 in Mexico, according to your testimony yesterday, you were
16 immediately forced into prostitution, correct?

17 **A.** Yes.

18 **Q.** But it wasn't your pimp? It was somebody else?

19 **A.** It was another woman.

10:44:09 20 **Q.** Okay. But when you moved from Guatemala to Mexico,
21 you were moving on the auspices or on the request or the
22 assistance of a family member, weren't you?

23 **A.** My brother's wife.

24 **Q.** So your sister-in-law?

10:44:30 25 **A.** Yes.

1 **Q.** She is the one that said come to Mexico?

2 **A.** Yes.

3 **Q.** She is the one that said I have work for you, I'm
4 going to help you?

10:44:38 **A.** Yes.

6 **Q.** Is she the one that forced you into prostitution?

7 **A.** She worked with that lady.

8 **Q.** And that lady is the pimp?

9 **A.** Yes.

10 **Q.** So your sister-in-law forced you into prostitution?

11 **A.** She said I had to work to support my child.

12 **Q.** I understand what she said. And you did it, right?

13 **A.** Yes.

14 **Q.** So at some point in time you met Joel, correct?

10:45:16 **A.** Yes.

16 **Q.** He is the gentleman that you have been talking to the
17 jury about. He is the pimp that brought you here to the
18 United States, correct?

19 **A.** Yes.

10:45:27 **Q.** Now, I don't want to go into depth into this; but you
20 -- before testifying today -- let me back up. You,
21 through the YMCA, were able to get status in this country,
22 were able to stay in the United States, correct?

24 **A.** Yes.

10:45:42 **Q.** So before you met with Ed, the gentleman sitting right

1 there, you had no status in the country, correct?

2 **A.** Before I sat down with him, no.

3 **Q.** Afterwards, through his assistance and through the
4 U.S. attorney's office help, you were able to obtain
5 status, correct?

6 **A.** Yes.

7 **Q.** As part of that process, you had to fill out paperwork
8 and give an affidavit. Do you remember that?

9 **A.** Yes.

10 **Q.** You talked about a lot of that that you talked about
11 in front of the jury on that affidavit. Do you remember
12 that?

13 **A.** Can you repeat the question?

14 **Q.** In the process of getting your paperwork when you did
15 your affidavit a lot of the facts you told the jury you
16 also put in your affidavit. Do you remember that?

17 **A.** Yes.

18 **Q.** Including your trip to Mexico and how you met Joel?

19 **A.** Yes.

20 **Q.** Okay. Correct me if I'm wrong. You came to Mexico to
21 work to make money to send back to your child, correct?

22 **A.** Yes.

23 **Q.** But according to what you are telling the jury and in
24 some of the affidavit it seems like you spent a lot of
25 time going to clubs and having fun with Joel, correct?

1 **A.** Can you repeat, please?

2 **Q.** The idea of coming to the United States was to make
3 money for your child, correct?

4 **A.** Yes.

10:47:11 5 **Q.** But according to your testimony yesterday and what is
6 in your affidavit, it seems like you spent a lot of time
7 with Joel going to clubs and having fun before he forced
8 you into prostitution; is that fair?

9 **A.** I don't understand the question.

10:47:31 10 **Q.** I'll move on. At some point in time, Joel forced you
11 into prostitution, according to your testimony, fair?

12 **A.** Yes.

13 **Q.** All right. And you were prostituted in Mexico?

14 **A.** Yes.

10:47:46 15 **Q.** And then at some point in time Joel had the brilliant
16 idea of bringing you into the United States?

17 THE COURT: Slow down, please.

18 MR. FAZEL: I'm sorry, Your Honor. I'm trying to
19 speed it up. I'm sorry.

10:47:55 20 **Q.** (By Mr. Fazel) At some point in time Joel said,
21 "Let's go to the United States," right?

22 **A.** Yes.

23 **Q.** When you were trying to get in the United States the
24 first time you were caught by immigration, right?

10:48:03 25 **A.** Yes.

1 **Q.** You were deported, right?

2 **A.** Yes.

3 **Q.** Where did they deport you to?

4 **A.** To Honduras.

10:48:11 5 **Q.** Honduras. Where did they deport Joel to?

6 **A.** Mexico.

7 **Q.** Mexico. And Honduras and Mexico are far, far away,
8 right?

9 **A.** Yes.

10 **Q.** So then you decided to go back to Joel again from
11 Honduras?

12 **A.** No. I didn't decide to go back. He forced me because
13 of my child.

14 **Q.** You were in Honduras, right?

10:48:39 15 **A.** Yes.

16 **Q.** He was in Mexico, right?

17 **A.** Yes. Yes.

18 **Q.** Okay. You traveled from Honduras to Mexico on your
19 own volition, correct?

10:48:48 20 **A.** No.

21 **Q.** Did somebody come and point a gun to your head and
22 make you go?

23 **A.** (Speaking Spanish.)

24 MR. FAZEL: No. The question was --

10:48:59 25 MR. PEREZ: She is trying to explain her answer,

1 Your Honor.

2 MR. FAZEL: No. She didn't answer my question.

3 MR. PEREZ: Well, she is trying to answer it.

10:49:07 4 THE COURT: All right. If you cannot answer a
5 question yes or no, tell the lawyer; and then, he will
6 have you explain. Okay.

7 All right. Ask a question, please.

8 MR. FAZEL: Yes, sir. I'm sorry.

9 Q. (By Mr. Fazel) Did somebody point a gun to your head
10 in Honduras and make you go to Mexico?

11 A. No.

12 Q. Nevertheless, you decided to go back to Mexico,
13 correct? Correct?

14 A. Yes.

10:49:34 15 Q. When you went back to Mexico, he engaged in the same
16 conduct that he had engaged with you before, correct?

17 A. Yes.

18 Q. And then, again, you came back to the United States?

19 A. Yes.

20 Q. And all this time that you are in the United States
21 you have a cousin who lives here in Houston, correct?

22 A. Yes.

23 Q. And while you are in the United States you have a cell
24 phone, don't you?

25 A. Yes.

1 **Q.** Now, prior to your testimony today you had had an
2 opportunity to meet with these lawyers and police officers
3 and FBI agents and talk about this case, correct?

4 **A.** Yes.

10:50:18 5 **Q.** And during that time you met with them on a number of
6 occasions, correct?

7 **A.** Yes.

8 **Q.** And every time you saw them taking notes about what
9 you said, right?

10:50:29 10 **A.** Yes.

11 **Q.** Okay. Now, as far as identifying Ms. Medeles, my
12 client, do you remember having a conversation with the
13 government in which you weren't sure when they presented
14 you with the photo of who she was?

10:50:52 15 **A.** Yes.

16 **Q.** But today and yesterday, boy, you pointed her right
17 out, didn't you?

18 **A.** May I say something?

19 **Q.** No. Let me ask the questions.

10:51:05 20 MR. PEREZ: Your Honor, can she explain her
21 answer, Your Honor?

22 THE COURT: Well, wait a second. He is entitled
23 to a yes or no. If you can't answer it yes or no, just
24 say. Can you answer that yes or no, or do you need to
25 explain?

1 THE WITNESS: I need to explain.

2 THE COURT: Okay. That's the best you can get.

3 So do you want to move on, or do you want to allow her to
4 explain?

10:51:24 5 MR. FAZEL: I'll move on, Your Honor. I'll do it
6 this way.

7 THE COURT: All right.

8 Q. (By Mr. Fazel) In a meeting with the prosecutors --
9 do you remember meeting with the prosecutors?

10:51:36 10 A. Yes.

11 Q. Do you remember them showing you a photo?

12 A. Yes.

13 Q. Did you not say this person -- did you not say, "I
14 think this was the owner of Las Palmas 2, but I'm not
15 sure"?

16 A. Yes.

17 Q. But when you come in to testify, you are sure it's
18 her?

19 A. Yes.

10:52:00 20 Q. Do you think the conversations you had with the police
21 kind of helped that along?

22 A. No.

23 Q. You were at Las Palmas for about two months, correct?

24 A. More or less.

10:52:24 25 Q. When you were going to Las Palmas, you were going on

1 the instructions of your pimp, correct?

2 **A.** Yes.

3 **Q.** He is the one that told you to go there?

4 **A.** Yes.

10:52:34 5 **Q.** He is the one that took your money?

6 **A.** Yes.

7 **Q.** He is the one that took your baby?

8 **A.** Yes.

9 **Q.** He is the one that forced you into abortions?

10:52:47 10 **A.** Yes.

11 **Q.** He is the one that made you come back from Honduras to
12 Mexico because of your child, correct?

13 **A.** Yes.

14 **Q.** He is the one that engaged in all the activity that
15 caused all these problems in your life, correct?

16 **A.** Yes.

17 **Q.** Ms. Medeles had nothing to do with you coming from
18 Honduras to Mexico, did she?

19 MR. PEREZ: Objection, calls for speculation,
10:53:09 20 Your Honor.

21 THE COURT: Overruled.

22 **Q.** (By Mr. Fazel) She had nothing to do with you giving
23 your money to your pimp, did she?

24 **A.** No.

10:53:15 25 **Q.** During your time at Las Palmas, the women came and

1 went, correct?

2 **A.** Yes.

3 **Q.** At the end of the night, all the women left the club,
4 correct?

10:53:36 5 **A.** Can you repeat?

6 **Q.** Sure. At the end of the night, when the club was
7 closed, everybody left, correct?

8 **A.** Yes.

9 **Q.** There was nobody living upstairs in the second floor,
10 was there?

11 **A.** I don't know.

12 **Q.** Were there armed guards at LP2, at Las Palmas Dos?

13 **A.** I don't remember.

14 **Q.** Now, you said something very interesting towards the
15 end of your conversation with the prosecutor. You said
16 you told the police about la tanda. Do you remember that?

17 **A.** Yes.

18 **Q.** Let me see if I can get this right. Correct me if I'm
19 wrong. It was the -- it was the custom of the pimps that
20 they would all get together, correct, pool their money
21 together, correct? Correct?

22 **A.** Yes.

23 **Q.** And every one of them would take the pot at some
24 occasion, correct?

10:54:40 25 **A.** Yes.

1 | Q. So all the pimps would get together, correct?

2 | A. Yes.

3 Q. Put all their money together in a pot, correct?

4 A. Yes.

10:54:48 5 Q. And then, one of them would take the money and go?

6 | A. Yes.

7 Q. This did not involve Ms. Medeles, did it?

8 **A.** (Speaking Spanish.)

9 Q. But she wasn't involved in that, was she?

10:55:06 10 MR. FAZEL: (addressing interpreter) Sorry.

11 **A.** I knew the padrotes were going to get together, but I
12 never saw her.

13 Q. (By Mr. Fazel) Because she wasn't a pimp, right?

14 | A. No.

10:55:20 15 MR. FAZEL: Pass the witness.

REDIRECT EXAMINATION

17 BY MR. PEREZ:

18 Q. I think Mr. Fazel asked you did you return to Mexico
19 and that nobody put a gun to your head. Do you remember
20 that?

21 A. Yes.

22 Q. Why did you return from Honduras to Mexico? You were
23 cut off. Explain it to the members of the jury, please,
24 ma'am.

10:55:43 25 A. Because when I arrived in Honduras that week, he said

1 I could stay a week; and then, I had to return because,
2 otherwise, I would never see my child again.

3 **Q.** Where was your daughter at that time?

4 **A.** In Mexico.

10:56:05 5 **Q.** With him?

6 **A.** Yes. Then I had to return. I did everything for my
7 child. When I returned, he picked me up; and that's when
8 he again prostituted me.

9 **Q.** Now, you also said that you -- mister -- the defense
10 attorney mentioned something about you had tentatively
11 ID'd this embittered woman. Can you explain that to the
12 members of the jury, please?

13 MR. FAZEL: Judge, I object to the form of the
14 question.

10:56:51 15 MR. PEREZ: That's what he said, Your Honor. He
16 said she tentatively ID'd. She has been identified as she
17 knowing her as the embittered woman, and I want to see
18 what her explanation is for her tentatively ID'ing the
19 defendant.

10:57:03 20 MR. FAZEL: Your Honor, if I may respond, the
21 problem is that the question is going to seek a narrative
22 response. I can't object to a narrative without
23 interrupting. So I would ask him to ask a specific
24 question in Q&A.

10:57:14 25 MR. PEREZ: On redirect she was trying to explain

1 her answer when he was crossing her, Your Honor. I'm
2 trying to see -- for her to explain her answer.

3 THE COURT: Overrule the objection.

4 Q. (By Mr. Perez) Okay. Explain to the members of the
5 jury about the tentative ID.

6 A. When Mr. Edwin showed me the pictures, he said, "Do
7 you know this person?"

8 I said, "I don't remember."

9 But after looking at the pictures, that's when I
10 remembered her. And at that instant is when I remembered
11 her.

12 And then I said, "Yes. I know her."

13 Q. The person you identified in court here today, is
14 there any doubt in your mind that that's the woman who ran
15 Las Palmas?

16 A. No.

17 MR. PEREZ: I'll pass the witness, Your Honor.

18 **RECROSS-EXAMINATION**

19 BY MR. FAZEL:

20 Q. Were you married to your pimp?

21 A. Yes.

22 Q. And the child, your child -- and I'm sorry about your
23 child. I understand the problem. Was the child with your
24 pimp or with his family, the daughter in Mexico?

25 A. With the father and the family.

1 MR. FAZEL: I pass the witness, Your Honor.

2 THE COURT: Anything further?

3 MR. PEREZ: No further questions, Your Honor.

4 THE COURT: Thank you, ma'am. You may step down.

10:58:48 5 You are excused. You are free to leave.

6 Call your next witness.

7 MR. PEREZ: XXXXXXXXXXXXXXXXXXXX, Your Honor.

8 THE COURT: Yes, ma'am. Raise your right hand.

9 (Witness sworn by the Court through the interpreter.)

10:59:31 10 THE COURT: Go on. We're ready. Just for the
11 record, how do you spell the name?

12 MR. PEREZ: XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
13 XXXXXXXXXXXXXXXXXXXXXXX.

14 THE COURT: Okay. Thank you.

15 XXXXXXXXXXXXXXXX,

16 having been first duly sworn, testified through the
17 interpreter as follows:

18 **DIRECT EXAMINATION**

19 BY MR. PEREZ:

11:00:22 20 Q. State your name.

21 A. XXXXXXXXXXXXXXXX.

22 MR. PEREZ: She is trying to climb on the chair,
23 Your Honor.

24 THE INTERPRETER: I finally got it.

11:00:32 25 THE COURT: There you go. We finally convinced

1 at least one of the interpreters to be comfortable.

2 Yes, sir. Okay. Go right ahead, please.

3 **Q.** (By Mr. Perez) State your name for the Court and
4 members of the jury, please.

11:00:44 5 **A.** XXXXXXXXXXXXXXXXXXXX.

6 **Q.** And are you from Mexico, ma'am?

7 **A.** Yes.

8 **Q.** Born in Mexico?

9 **A.** Yes, in Tapachula Chiapas.

10 **Q.** While you were in Mexico, did you meet a person who
11 became your boyfriend?

12 **A.** Yes.

13 **Q.** And while you were in Mexico and you met this person,
14 did you eventually become a prostitute there in Mexico?

11:01:26 15 **A.** Yes.

16 **Q.** Describe the situation for the members of the jury
17 under which you became a prostitute for that person.

18 **A.** (Speaking Spanish.)

19 **Q.** Okay. I'll try to make it brief. Okay. While you
11:01:48 20 were in Mexico you said you became a prostitute?

21 **A.** Yes.

22 **Q.** Did you have a pimp in Mexico?

23 **A.** Yes.

24 **Q.** How did that person, that pimp, convince you to become
11:02:03 25 a prostitute?

1 **A.** He would threaten me with my family.

2 THE COURT: He what?

3 THE INTERPRETER: He would threaten me with my
4 family.

11:02:17 5 THE COURT: Okay.

6 **Q.** (By Mr. Perez) What would he tell you he would do to
7 your family?

8 **A.** That he was going to kill my mother, my sister, my
9 brother and my grandmother.

11:02:36 10 **Q.** Did you believe that he would do that?

11 **A.** Yes.

12 **Q.** How did he threaten you?

13 **A.** Well, he began first by telling me that he was going
14 to kill me. I feared him. I was very little.

11:03:04 15 **Q.** How old were you when you met this person?

16 **A.** I was going on 18.

17 **Q.** You were 17 at the time?

18 **A.** I don't remember too well, but it was like almost --
19 like within a month or a few days.

11:03:25 20 THE COURT: How old are you at this time, ma'am?

21 THE WITNESS: 23.

22 **Q.** (By Mr. Perez) Did you -- after he threatened you,
23 did you, in fact, become a prostitute, as you said, in
24 Mexico?

11:03:47 25 **A.** Yes.

1 **Q.** Where did you work as a prostitute in Mexico?

2 **A.** First it was in the Red Zone in Laredo.

3 **Q.** Let me ask you this: You met him in, I think you
4 mentioned, Chiapas?

11:04:06 5 **A.** Yes.

6 **Q.** And then, is Chiapas very far from Nuevo Laredo?

7 **A.** It's from one border to the other.

8 **Q.** Pretty far then, right?

9 **A.** Yes.

11:04:18 10 **Q.** How did you get from Chiapas to Nuevo Laredo?

11 **A.** First of all, he took me from my town to Puebla
12 Tenancingo. And then after a few days he used to treat me
13 bad. He used to beat me a lot there.

14 **Q.** Why would he -- why would he tell you that he beat you
15 there?

16 **A.** In Tenancingo, he started to beat me up badly on any
17 part of my body. He wanted me to work as a prostitute;
18 but sincerely, I didn't want to.

19 **Q.** So in order to convince you to become a prostitute,
20 not only did he threaten your family but he beat you, as
21 well?

22 **A.** Yeah.

23 **Q.** Did this fellow know that -- did your family owe any
24 money to this fellow?

11:05:43 25 **A.** Yes.

1 **Q.** Explain that to the members of the jury, please,
2 ma'am.

3 **A.** When I went with him to Tenancingo, I was already
4 working in Nuevo Laredo. And in Nuevo Laredo my aunt had
5 an abortion. And my aunt needed some money for the wells.
6 And since I'm the head of the family -- and, well, he
7 borrowed money from another person. Well, he said it was
8 from another person; but I know it was his. It was a
9 quantity of 20,000 pesos with the condition that my mother
10 would repay it. And at that time -- and I don't know. I
11 don't know how it happened. But he said that I would have
12 to repay it through prostitution.

13 **Q.** So as a result, you engaged in prostitution in Nuevo
14 Laredo?

15 **A.** Yes. I was already working in Nuevo Laredo when that
16 happened.

17 **Q.** Okay. Where was -- how long had you been a prostitute
18 for this fellow at the time you met him all the way up to
19 the time you worked in Nuevo Laredo?

20 **A.** (Speaking Spanish.)

21 **Q.** From the time you started in Chiapas to Nuevo Laredo,
22 how much time had elapsed, approximately, if you know?

23 **A.** I don't remember.

24 **Q.** Was it more than a year, less than a year?

25 **A.** From Chiapas to Nuevo Laredo? Because it was also in

1 DF. Does that count, as well?

2 **Q.** Okay. Let me -- yes, it does. Let me ask it this way
3 to try to streamline it. Okay. Were you a prostitute for
4 this fellow in Chiapas?

11:08:40 5 **A.** No. In Chiapas, no.

6 **Q.** Where was it the first time that you became a
7 prostitute for this fellow?

8 **A.** Nuevo Laredo.

9 **Q.** How long after you met him did he take you to Nuevo
11:09:15 10 Laredo?

11 **A.** First, he took me to Tenancingo. Then he took me to
12 Nuevo Laredo. And so I think that I was, like, about, oh,
13 a couple of weeks.

14 **Q.** I know you are nervous. Okay. My question is this --
11:09:34 15 I'm going to try to ask it as simply as I can. Okay?

16 **A.** Okay.

17 **Q.** You met him in Chiapas, right?

18 **A.** Yes.

19 **Q.** You told us that you went to Nuevo Laredo?

11:09:48 20 **A.** Yes.

21 **Q.** And then you told us --

22 **A.** Yes.

23 **Q.** And then you told us that you went -- that you were
24 also taken to Mexico City?

11:09:58 25 **A.** Yes. Excuse me.

1 Q. Take your time, okay, please.

2 A. It's my ignorance. It's that, first of all, well, I
3 met him in Chiapas. Then he took me to meet his family in
4 Tenancingo. I was there a few days. I don't remember too
5 well. And after that we traveled to Nuevo Laredo. And in
6 Nuevo Laredo, what is that, so I wouldn't have to put up
7 with too many persons, I would charge a little bit more.
8 It -- because it caused me a lot of --

9 THE INTERPRETER: (Speaking Spanish to other
10 interpreter.)

11 THE INTERPRETER: It was revolting to me.

12 A. It was revolting. And from Nuevo Laredo he brought me
13 to DF where I worked at the Merce. And in Nuevo Laredo I
14 did work a little bit more at a place called El Callejon
15 de San Pablo. And from Nuevo Laredo to DF it was from
16 eight to nine months. I don't remember too well.

17 Q. (By Mr. Perez) And then from there where did you go
18 next?

19 THE COURT: All right. Lead a little bit. Let's
20 get to the United States. Okay?

21 MR. PEREZ: Yes, sir.

22 THE COURT: I'll allow you to lead a little bit.
23 Okay.

24 Now, by the way, I do this in every case. This is --
25 you know, you hear about, "I object. It's a leading

1 question." Okay.

2 If it is your own witness, you can't ask -- you are
3 not supposed to ask leading questions. So if it's your
4 own witness, let's take for example in a personal injury
5 case.

6 "Where were you on July 9th, 2015?"

7 "I was at home."

8 "What happened?"

9 He said, "I heard a knock on the door."

10 "What did you do then?"

11 "I walked to the door."

12 "And then what did you do?"

13 "I opened the door, and I looked out."

14 "What, if anything, did you see?"

15 "I saw it was raining."

16 "Did you see anything else?"

17 "Yes."

18 "What was that?"

19 "I saw a car crashed into the tree."

20 Now that's if it's your own witness. If it's the
21 opposing witness -- in other words, if it's on
22 cross-examination, you can ask leading questions. So if
23 it's a cross on the same subject, you could say, "Isn't it
24 true that you were home on July 9th?"

25 "Okay."

1 "That you heard a knock on the door and you walked to
2 the door, you opened it and you saw it was raining?"

3 "Yes."

4 "And then, you also looked out; and you saw a car
11:13:39 5 crashed into the tree?"

6 Now, that's a leading question, meaning supposedly if
7 it's your own witness you are not supposed to suggest the
8 answer you may be looking for. Okay. That's a leading
9 question.

10 So what, if anything, happened versus isn't it true
11 that this happened. That's the leading question you can
12 do on cross-examination.

13 In federal court, especially, the judge has some
14 flexibility to allow some leading questions but not too
11:14:07 15 many. Okay. I'm going to allow -- on this witness I'm
16 going to allow the government to lead a bit.

17 If it gets too much, Mr. Fazel -- you know, we have
18 talked about this ahead of time -- will then come up and
19 respectfully, you know, say, well, maybe we have had
11:14:22 20 enough leading. Let's return to question and answer.

21 Okay. So that, in effect, is what you have been
22 seeing back and forth. A little bit about the difference
23 between your witness, no leading questions. On cross, you
24 may.

25 So now this is direct examination. I'm going to give

1 him a little flexibility to move it along a little bit
2 with this witness.

3 MR. PEREZ: Thank you, Your Honor.

4 **Q.** (By Mr. Perez) So, ma'am, you were out. You were in
11:14:47 5 Nuevo Laredo. Then you worked at the DF; is that correct?

6 **A.** Yes.

7 **Q.** After you worked at the DF as a prostitute, where did
8 you next go?

9 **A.** Over here to the United States.

10 **Q.** So during the time that you worked in Nuevo Laredo and
11 DF, you worked as a prostitute for your pimp?

12 **A.** Yes.

13 **Q.** If you didn't work as a prostitute for your pimp,
14 would he beat you?

15 **A.** Yes, he would beat me.

16 **Q.** Can you describe to the members of the jury how he
17 would beat you?

18 **A.** At first, if I wouldn't do what he told me to do, he
19 would hit me on my face, my private parts, my back,
11:15:50 20 anywhere that he wanted to do so.

21 **Q.** How long did you work at DF before coming to the
22 United States?

23 **A.** (No response.)

24 **Q.** Let's move on. After you worked at DF, did you come
11:16:16 25 to the United States?

1 **A.** Yes.

2 **Q.** Who made arrangements for you to come to the United
3 States after you worked at DF?

4 **A.** The padrote that I had.

11:16:30 5 **Q.** Again, what was his name?

6 **A.** Claudio Sanchez Calderon.

7 **Q.** And he was a member of a group of pimps; is that
8 correct?

9 **A.** Yes.

10 **Q.** What was the name of his group, if you know?

11 **A.** There were a lot of them, uncles, cousins, and
12 brothers and nephews.

13 **Q.** So this person, your pimp, was a family member of a
14 family full of pimps?

11:17:16 15 **A.** Yes. All of Tenancingo is an area of nothing but
16 pimps, padrotes.

17 **Q.** When you say "DF" you mean Mexico City, right?

18 **A.** Yes, the Federal District. It's District Federal.

19 **Q.** Now, your pimp made arrangements for you to come to
11:17:42 20 the United States. Did he come with you?

21 **A.** Yes.

22 **Q.** And did you cross from Mexico to the United States
23 legally or illegally?

24 **A.** Without documentation.

11:17:58 25 **Q.** After you crossed the border, did you come to Houston,

1 Texas?

2 **A.** Yes.

3 **Q.** When you arrived in Houston, Texas, did you work as a
4 prostitute here in Houston, Texas?

11:18:13 5 **A.** Yes.

6 **Q.** And where did you work as a prostitute here in
7 Houston, Texas?

8 **A.** First was -- I don't remember the first place that I
9 worked at, truthfully.

11:18:35 10 **Q.** Okay. We want you to be truthful. Okay?

11 **A.** Yes. But, truthfully, I don't remember.

12 **Q.** Okay. Well, did you work at a second place as a
13 prostitute?

14 **A.** Yes. Yes.

11:18:49 15 **Q.** What place was that?

16 **A.** I only worked there a few days. It was La Costenita.

17 **Q.** After you worked there at La Costenita, where did you
18 next work?

19 **A.** At Las Palmas.

11:19:11 20 **Q.** And you worked there at Las Palmas from May/June 2010
21 to March 2011; is that correct?

22 **A.** Yes.

23 **Q.** Who hired you there at Las Palmas?

24 **A.** It was a man by the name of Juan.

11:19:29 25 **Q.** And he is the one that hired you; is that correct?

1 **A.** Yes.

2 **Q.** Do you recognize a person by the name of Tencha?

3 **A.** By her name, no; but I did see her.

4 **Q.** Okay. Is that person that you don't know the name but
11:19:51 5 that -- was she the owner of Las Palmas, this person you
6 just described, the female?

7 **A.** Yes.

8 **Q.** Is the owner of Las Palmas here in the courtroom
9 today?

10 **A.** Yes.

11 **Q.** Can you please point to her and describe what she is
12 wearing for the Court and the members of the jury.

13 **A.** It's the woman with gray hair.

14 **Q.** Can you point to her, please.

15 **A.** (Witness indicating.)

16 **Q.** Are you scared of her?

17 **A.** Hmm, no.

18 MR. PEREZ: Okay. Your Honor, may the record
19 reflect this witness has identified the defendant?

20 THE COURT: The record will so reflect.

21 **Q.** (By Mr. Perez) Okay. You said you didn't know her,
22 but that she was the owner of Las Palmas; is that right?

23 **A.** To know her, well, I had seen her there several times;
24 but I didn't know -- actually meet her. However, I knew
11:21:08 25 that she was called the owner. I was told she was the

1 owner. And she was called the owner and the Bitter Woman,
2 La Amargada.

3 **Q.** Okay. Would you see her there at Las Palmas?

4 **A.** On a daily basis, she would come in; and she would get
11:21:46 5 there and -- like, outside. But there were two times when
6 she did come in.

7 **Q.** And these two times that she did come in, what did you
8 see her do?

9 **A.** Once when counting the money from the women, those of
11:22:14 10 us who would go upstairs. It was -- there was a door.
11 You had to knock on it. I don't remember whether it was
12 once or twice or knock differently. And we would knock in
13 a certain way in order to say that it was us, not the
14 police.

11:22:58 15 And from there I saw her counting money one time
16 because after that it was the second floor. And sometimes
17 checking the rooms; but just from the outside, not in.

18 And then there was one time, excuse me, that the
19 police arrived. On that day we left about 10 minutes
11:23:38 20 early, 10 or 15. I don't remember well. They called us
21 all together.

22 THE INTERPRETER: (Coughing) Excuse me.

23 **A.** They called us all together. They said the police had
24 come in.

11:24:00 25 **Q.** (By Mr. Perez) Who called you in?

1 **A.** Mr. Juan.

2 **Q.** And was Tencha there at the meeting, as well?

3 **A.** Yes, she was there. She would tell Mr. Juan to tell
4 us to put on pants in case that the police should come in.
11:24:37 5 And if the police were to arrive, we were to say that we
6 didn't know her and that we didn't have pimps. And
7 sometimes Mr. Juan would say that she knew that there were
8 minors but that she was taking a chance.

9 **Q.** Now, how much did you charge there at Las Palmas for a
11:25:21 10 sex act?

11 **A.** I think, but I don't remember too well. I think it
12 was \$65.

13 **Q.** Okay. Was any of that money -- would any of the money
14 go to Las Palmas?

11:25:42 15 **A.** \$20.

16 **Q.** And the rest would go to whom?

17 **A.** For the owner.

18 **Q.** The money that you kept, did you give that to your
19 pimp?

11:25:59 20 **A.** Yes.

21 **Q.** You worked there every day or just on the weekends?

22 **A.** Every day except on Tuesday, I think it was, the day
23 off.

24 **Q.** From what time to what time would you work there?

11:26:29 25 **A.** On weekends, 3:00 in the afternoon until 3:00 in the

1 early morning hours, 3:00 or 4:00. I don't remember too
2 well.

3 **Q.** Now, on the weekends, on a typical Saturday night, how
4 many women, in your estimation, would work there on
5 Saturday night?

6 **A.** There were several. I never had any personal dignity
7 to count them. I was sent to work. And if I didn't work,
8 I would get beaten.

9 **Q.** Now, for these \$20, would you get a condom for these
10 \$20?

11 **A.** No. It was downstairs, \$15. They would hand you a
12 piece of paper. And then, you went on upstairs and \$5 and
13 you would be given a condom. And then, you went on
14 inside; and you did what you had to do.

15 **Q.** So the people who worked for Tencha are the ones that
16 provided the condoms?

17 **A.** Yes.

18 **Q.** And the people who worked for Tencha, was Tencha the
19 one giving orders there at Las Palmas?

20 **A.** The one who handed out the orders was Mr. Juan.

21 MR. PEREZ: I'll pass the witness, Your Honor.

22 MR. FAZEL: May I proceed, Your Honor?

23 THE COURT: Yes, sir.

24 **CROSS-EXAMINATION**

25 BY MR. FAZEL:

1 **Q.** Good morning, ma'am. How are you?

2 **A.** Fine. Thank you.

3 **Q.** I know you are a little nervous. It's okay. I'm
4 going to ask you some questions. If you don't understand
5 me, if you want me to repeat myself, please let me know;
6 and I will. Okay?

7 **A.** Okay.

8 **Q.** Are you now living in the United States?

9 **A.** Yes.

10 **Q.** And are you learning a little bit of English? I hear
11 you say "okay" a lot.

12 **A.** I want to learn.

13 **Q.** Okay. Good. I want to talk to you a little bit
14 about, just very briefly, about Mexico. I don't want to
15 rehash it or bring it back to you. Just a little bit.
16 Okay?

17 THE COURT: Go on.

18 MR. FAZEL: Yes, sir.

19 **Q.** (By Mr. Fazel) When you met your pimp in Mexico, you
20 were 18 years old, correct?

21 **A.** No.

22 **Q.** 17?

23 **A.** No. I was only going on 18.

24 THE COURT: What age?

25 THE WITNESS: I was days away or I don't exactly

1 remember how much but I was going on 18.

2 THE COURT: All right.

3 MR. FAZEL: Okay.

4 **Q.** (By Mr. Fazel) And in -- after you met him and he
11:30:07 5 forced you into prostitution, he was in control of your
6 activities, correct?

7 **A.** Yes.

8 **Q.** And he was the one that told you what to do, where to
9 go; and you gave the money to him, correct?

10 **A.** Correct.

11 **Q.** Ms. Medeles had nothing to do with that, correct?

12 **A.** No.

13 **Q.** And the family that you described to the ladies and
14 gentlemen of the jury, the cousins, uncles, all the whole
11:30:36 15 family that you just talked about just a minute ago, do
16 you remember that?

17 THE COURT: When? In Mexico?

18 MR. FAZEL: During her testimony regarding her
19 pimp's family, Your Honor.

20 THE COURT: In Mexico?

21 MR. FAZEL: Yes, Your Honor.

22 THE COURT: In Mexico. All right. Go on.

23 Question. I'm sorry. I interrupted. I had a question
24 about that.

25 MR. FAZEL: Okay.

1 **Q.** (By Mr. Fazel) Do you remember talking about the
2 pimp's family in Mexico, that he had cousins and uncles
3 and everybody that was in the business of pimping? Do you
4 remember that?

11:31:04 **A.** Yes.

6 **Q.** Ms. Medeles is not involved in that family, correct?

7 **A.** No.

8 **Q.** So all the activity that occurred in Mexico occurred
9 between you and the pimp and what he made you do over
11:31:21 10 there, fair?

11 **A.** Yes.

12 **Q.** And he is the one that paid for you to come to the
13 United States?

14 **A.** Yes.

11:31:29 15 **Q.** And he is the one that put you in an apartment or
16 wherever he put you up in the United States, correct?

17 **A.** Yes.

18 **Q.** Now, let me talk to you about the money in the United
19 States.

11:31:44 20 **A.** Okay.

21 **Q.** When you went to Las Palmas and you were working
22 there, I understand that a certain amount of money had to
23 go to the house, to Las Palmas. The rest of it went to
24 your pimp, correct?

11:31:56 25 **A.** Yes.

1 **Q.** And while you were in Las Palmas doing what the pimp
2 made you do, you actually could charge more for whatever
3 the gentleman wanted, correct?

4 **A.** Yes.

11:32:12 5 **Q.** So the negotiations, if you will, between you and the
6 gentleman was up to you, correct?

7 **A.** Well, it was whatever he wanted to do with one's self,
8 the price would go up a little.

9 **Q.** But the price that you paid Las Palmas, the money that
11:32:40 10 you paid Las Palmas stayed the same?

11 **A.** Yes.

12 **Q.** And that's --

13 **A.** (Speaking English) Excuse me.

14 **Q.** Yes, of course. That's very good. Go ahead.

11:32:55 15 **A.** If I ran over time, then it would be \$30 to \$40. And
16 if it was an hour or two, well, it would be more for her.

17 **Q.** Okay. But the price structure was set so that if it's
18 more than 15 minutes you had to pay something extra to the
19 house?

11:33:25 20 **A.** If he went over 15 minutes then you would have to
21 begin to pay a little more.

22 **Q.** Right. My point being that that was a set structure
23 that everybody knew. Any money over that, you kept; and
24 you had to give to the pimp?

11:33:44 25 **A.** Yes.

1 Q. There is -- you talked about the police arriving. Do
2 you remember that just a little while ago?

3 A. Yes.

4 Q. And there was a meeting regarding what the folks at
11:34:03 5 Las Palmas wanted you all to do?

6 A. Yes.

7 THE COURT: What do you mean? If they got
8 raided?

9 MR. FAZEL: She testified there was some police
11:34:14 10 activity. I was just talking about that.

11 THE COURT: All right.

12 Q. (By Mr. Fazel) The idea of the meeting -- correct me
13 if I'm wrong, the idea of the meeting was to make sure
14 that the police, if they came in, wouldn't arrest any of
11:34:27 15 the girls, correct?

16 A. It was 10:00 at night, more or less, 9:00 or 10:00
17 when the police arrived. Some were undercover, and some
18 were normal. And they handcuffed the women. They checked
19 out our ID's, everything. And I know that they took away
11:35:09 20 girls who were minors.

21 Q. I understand that. I guess my question was: When you
22 had the meeting, the idea of the meeting was to make sure
23 that in the future they wouldn't try to arrest the women
24 for prostitution, correct?

11:35:29 25 A. (Speaking Spanish.)

1 Q. Sure. When they said to cover up -- I'm sorry. She
2 needs to translate.

3 A. Please repeat the question.

4 Q. When they said to the women cover up, make sure you
5 are covered up, don't talk about the pimps, don't talk
6 about prostitution, the idea was to make sure that the
7 women don't get arrested, correct, if you know?

8 MR. PEREZ: Calls for speculation on the part of
9 this witness, Your Honor.

10 THE COURT: If she knows. Overruled.

11 Do you know that or not?

12 Why don't you rephrase it, Counsel. Okay. That's the
13 easiest way.

14 MR. FAZEL: Yes.

15 THE COURT: By the way, we have been in session
16 now exactly an hour and a half. Okay. I -- let me turn
17 this. It's now about, oh, about 11:36 or 11:37. Let's
18 take a break to about 11:50. We'll get back in and go to
19 about 1:00 or 1:05. Okay. So we'll see you back in about
20 15 minutes.

21 THE MARSHAL: All rise.

22 (Jury exited courtroom at 11:36 a.m.)

23 (Recess from 11:36 a.m. to 11:55 a.m.)

24 THE MARSHAL: All rise.

25 THE COURT: Call the jury in, please. You can

1 call them in.

2 (Jury entered courtroom at 11:55 a.m.)

3 THE COURT: Have a seat, please. Go right ahead,
4 please.

11:56:36 5 MR. FAZEL: Thank you, Your Honor.

6 THE COURT: Are you going to need that?

7 MR. FAZEL: Yes, Your Honor. I'm sorry. May I
8 proceed, Your Honor?

9 THE COURT: Yes. Go right ahead.

11:57:07 10 MR. FAZEL: Thank you.

11 Q. (By Mr. Fazel) I want to show you some photographs.
12 You let me know if you recognize the person.
13 Specifically, I want to show you the gentleman that you
14 talked about in front of the jury before named Juan. Do
15 you remember talking about Juan?

16 A. Yes.

17 Q. Okay. I'm going to direct your attention to this
18 photograph right here. It's Government's Exhibit P, as in
19 Paul, 35. Is that the Juan you are talking about?

11:57:29 20 A. Yes.

21 Q. Okay. This is the gentleman who hired you?

22 A. Yes.

23 Q. This is the gentleman that on a daily basis would give
24 instructions and tell people what to do at the bar?

11:57:47 25 A. Yes.

1 **Q.** Now, explain something to me so that I am clear on
2 this. There were -- there are a lot of women coming into
3 the bar that were from different places in Houston. They
4 all didn't live together, correct?

11:58:24 **A.** Correct.

6 **Q.** And some of them had pimps; and some of them didn't
7 have pimps, correct?

8 **A.** I don't know, truthfully.

9 **Q.** The point being that on a daily basis there were
10 different sets of women that were in the bar, correct?

11 **A.** Yes. Like when they came in from Mexico, there would
12 be more persons coming in.

13 **Q.** Okay. I guess my question is -- and maybe I wasn't
14 very specific. But while the girls were coming into the
15 bar, like on Monday there would be certain girls coming
16 into the bar. But on Tuesday, there might be different
17 girls coming into the bar, correct?

18 **A.** There were some who would take a day off and others
19 wouldn't.

11:59:27 **Q.** Okay. And the girls' schedule, if you know -- it's
20 okay if you don't -- but the girls' schedule was depending
21 on their pimps or themselves, if they didn't have pimps,
22 correct?

24 **A.** (Speaking Spanish.)

11:59:44 **Q.** I'm sorry. If you could just answer my question.

1 MR. PEREZ: She is trying to, Your Honor. She
2 said, "Let me see if I can answer it."

3 THE COURT: All right. You may answer the
4 question.

11:59:57 5 **A.** (Speaking Spanish.)

6 **Q.** (By Mr. Fazel) Sure. That's all right. The schedule
7 of when the girls came into the bar was either set by the
8 pimps or, if they didn't have pimps, by themselves,
9 correct?

12:00:10 10 **A.** No. The pimps would set the schedules. If we came in
11 late, then you would be charged a late fee.

12 **Q.** Right. The bar had a fee for the girls if they were
13 late. I understand that. But whether the girls were
14 showing up that day or not, that was up to the pimps?

12:00:42 15 **A.** Yes.

16 **Q.** The bar had no control over that?

17 **A.** I don't know anything. I only know about me.

18 **Q.** Well, let's talk about you. You did what your pimps
19 said?

12:01:00 20 **A.** Yes.

21 **Q.** So if your pimp said, "I don't want you at the bar
22 today," you wouldn't go to the bar?

23 **A.** That would have been good; but, no, I went every day.

24 **Q.** Right. But that's because your pimp made you?

12:01:18 25 **A.** Yes.

1 **Q.** But if the pimp said you were going to go to a
2 different bar, you would go to a different bar?

3 **A.** Yes, as well.

4 **Q.** And if the pimp said you are not going to the bar, you
5 wouldn't go to the bar?

6 **A.** Yes, as well.

7 **Q.** The control is on the pimp, correct?

8 **A.** Correct.

9 MR. FAZEL: I pass the witness.

10 **REDIRECT EXAMINATION**

11 BY MR. PEREZ:

12 **Q.** Yes. The defense attorney asked you whether you
13 recognized anybody on an exhibit, and you identified Juan
14 Cepeda?

15 **A.** Yes.

16 **Q.** Let me ask you this: Can you identify anybody on
17 P-36? P-36.

18 **A.** Yes.

19 **Q.** Who is that person depicted on P-36?

20 **A.** That was the person who charged for the condoms.

21 **Q.** And he worked there at that location, right, Las
22 Palmas?

23 **A.** Yes.

24 **Q.** And how about P-29? Do you recognize the person on
25 P-29?

1 **A.** Yes. He is XXXXXXXXXX pimp.

2 **Q.** Who is XXXXXXXX?

3 **A.** She was a girl who worked there, as well.

4 **Q.** And would you see that fellow there at Las Palmas?

12:02:59 5 **A.** No. I only saw her in the malls with him.

6 **Q.** And P-28, who is that?

7 **A.** She said that she was the woman's niece.

8 **Q.** When you say "la senora," is that --

9 **A.** She is the one that is present over there.

12:03:30 10 MR. MAGLIOLO: I couldn't hear that, Your Honor.

11 I'm sorry.

12 THE COURT: She is the one who is?

13 THE INTERPRETER: Present over there.

14 **Q.** (By Mr. Perez) And when you say that, the person that
15 you identified as the owner of Las Palmas, right?

16 **A.** Yes.

17 **Q.** What was the person depicted on P-28's job there at
18 Las Palmas?

19 **A.** She was there Saturday and Sunday serving beer.

12:03:58 20 **Q.** Do you know her name?

21 **A.** No. We only called her the Marimacha.

22 **Q.** What now?

23 **A.** Marimacha.

24 **Q.** What does that mean?

12:04:16 25 **A.** "Marimacha" means that she likes women, something like

1 that.

2 **Q.** Although Juan told the girls what to do, you did see
3 Tencha tell him what to say to the girls, right?

4 **A.** Yes.

12:04:38 5 **Q.** So the person who gave orders there was Tencha?

6 **A.** Yes.

7 MR. PEREZ: Pass the witness, Your Honor.

8 MR. FAZEL: I have no other questions.

9 THE COURT: Thank you. You may step down. You
12:04:51 10 are excused. You are free to leave.

11 Call your next witness, please.

12 MR. PEREZ: XXXXXXXXXXXXXXX, Your Honor.

13 THE COURT: The first name is XXXXXXX?

14 MR. PEREZ: It's XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
12:05:19 15 XXXXXXXXX.

16 MR. MAGLIOLO: With the Court's permission, I'm
17 going to put the two placards there so the jury can see.

18 (Witness sworn by the case manager through the
19 interpreter.)

12:05:55 20 CASE MANAGER: Thank you.

21 THE COURT: Okay. Go right ahead, please.

22 **XXXXXXXXXXXXXXXXXXXX,**

23 having been first duly sworn, testified through the
24 interpreter as follows:

25 **DIRECT EXAMINATION**

1 BY MR. PEREZ:

2 Q. State your name for the Court and the members of the
3 jury, please, ma'am.

4 A. XXXXXXXXXXXXXXXXXXXXXXXX.

12:06:31 5 Q. How old are you, XXXXXXXXXXXXXXXXXXXXXXXX?

6 A. 20.

7 Q. What is your birthday?

8 A. September 16th.

9 Q. And year?

12:06:48 10 A. '94.

11 Q. Are you originally from Mexico, or are you from
12 Mexico? Were you born in Mexico?

13 A. Yes. I'm Mexican.

14 Q. I want to direct your attention to -- briefly to
15 Mexico. You were born in Mexico?

16 A. Yes.

17 Q. When you were 16 years of age -- or let me ask it this
18 way: When you were young there in Mexico, did you meet a
19 man?

12:07:17 20 A. Yes.

21 Q. Who later became your pimp?

22 A. Yes.

23 Q. How old were you when you met this man who later
24 became your pimp?

12:07:29 25 A. 15.

1 **Q.** Where did you meet him there in Mexico?

2 **A.** In the city close where I lived.

3 **Q.** What was the city close to where you lived?

4 **A.** Apizaco.

12:07:51 5 **Q.** Where did you meet this fellow?

6 **A.** At the park.

7 **Q.** What was his name?

8 **A.** He told me his name was Daniel.

9 **Q.** Was his name Daniel?

12:08:08 10 **A.** No. His real name is Norberto.

11 **Q.** Did he also have a nickname?

12 **A.** Yes.

13 **Q.** What was his nickname?

14 **A.** Teco.

12:08:25 15 **Q.** When did you realize that the name he had given you
16 was not his true name?

17 **A.** He afterwards showed me his ID with his real name.

18 **Q.** Let me ask you this: You met this fellow Teco. Did
19 he convince you to become a prostitute while you were in
20 Mexico?

21 **A.** Yes.

22 **Q.** Tell the members of the jury how he convinced you or
23 persuaded you to become his pimp -- for him to become your
24 pimp?

12:09:12 25 **A.** I was already living with him, and he said he was

1 going to return me to my mother because he was coming to
2 the United States. He had no money to bring me here. He
3 just didn't have enough money for the two of us.

4 **Q.** Were you in love with him at the time, ma'am?

12:09:43 5 **A.** I was in love with him, yes.

6 **Q.** How long after you met him -- how long after you met
7 him there at the park did you move in with him?

8 **A.** About two months.

9 **Q.** Do you come from a very poor background there in
12:10:12 10 Mexico, ma'am?

11 **A.** What did you say?

12 **Q.** Do you come from a poor background there in Mexico?

13 **A.** We are not very poor, but we do have what is needed.

14 **Q.** How many brothers and sisters do you have?

12:10:31 15 **A.** I have three sisters and one brother.

16 **Q.** So you move in with him. He tells you that he is
17 coming to the United States without you. Does that upset
18 you?

19 **A.** Yes. I got sad because I loved him, and I didn't want
12:10:54 20 him to leave me.

21 **Q.** So what did you do?

22 **A.** Then I told him, yes, I would work at what he had told
23 me because two months before -- because he had suggested
24 to me that I should work in that.

12:11:20 25 **Q.** Okay. I know this is embarrassing. When you say "in

1 that," what do you mean "in that"?

2 **A.** As a prostitute.

3 **Q.** So initially you told him no?

4 **A.** At the beginning I told him I was going to think about
5 it.

6 **Q.** Then when he decided to come to the U.S. without you,
7 is that when you decided to become his prostitute?

8 **A.** Yes.

9 **Q.** And what promises did he make you in return for you
10 becoming his prostitute?

11 **A.** That we were going to work. He promised me that we
12 were going to build a house and have a family.

13 **Q.** Was that house going to be in Mexico?

14 **A.** Yes.

15 **Q.** So did you work for him as a prostitute in Mexico?

16 **A.** Yes.

17 **Q.** How long did you work for him as a prostitute in
18 Mexico?

19 **A.** I worked for two months.

20 **Q.** And after those two months, what happened?

21 **A.** After two months he told me we had enough money so
22 that the two of us could come here to Houston.

23 **Q.** Did you come with him to the United States to Houston?

24 **A.** Yes.

25 **Q.** When you arrived in Houston, where did you all --

1 where did you all go?

2 **A.** Again, please.

3 **Q.** When you came to Houston, did you live somewhere?

4 **A.** Yes.

12:13:39 5 **Q.** Where did you live?

6 **A.** In an apartment with his cousin and the cousin's wife.

7 **Q.** Did you arrive in Houston by the use of a coyote?

8 **A.** Yes.

9 **Q.** Who made the arrangements for the coyote?

12:14:02 10 **A.** He did, my pimp.

11 **Q.** So when you arrived in Houston and you lived -- I'm
12 sorry. I forgot. Who did you live with here in Houston?

13 **A.** Again, please.

14 **Q.** Who did you live with in the apartment here in
15 Houston?

16 **A.** With his cousin and the cousin's wife. We were living
17 with them.

18 **Q.** Was he a pimp, his cousin?

19 **A.** What he was telling me at the beginning was that he
20 was not, that they were working at something else.

21 **Q.** Did you eventually learn that, in fact, he was also a
22 pimp; and that his wife was working for him as a
23 prostitute?

24 **A.** Yes.

12:15:00 25 **Q.** How long after you arrived in Houston and lived at the

1 apartment did you learn that, that he was a pimp?

2 **A.** I found out -- I don't remember.

3 **Q.** Okay. But at some point you found out that, in fact,
4 his cousin was also a pimp?

12:15:27 5 **A.** Yes. Because the taxi that used to take me to the bar
6 when I was working told me that the woman with whom he was
7 living that she was lucky she hadn't been caught at the
8 bar because it had just closed.

9 **Q.** And was that the Las Palmas, or do you know?

12:15:58 10 **A.** Another bar. I don't remember the name.

11 **Q.** Did that other woman live at the -- I mean, work at
12 the Las Palmas, as well?

13 **A.** No.

14 **Q.** Did you work at a brothel before working at Las
15 Palmas?

16 **A.** In Mexico.

17 **Q.** I understand that. But here in the United States, the
18 brothel where you worked was Las Palmas?

19 **A.** Yes.

12:16:27 20 **Q.** And I want to direct your attention to February 2011.
21 Is that the time that you worked at Las Palmas as a
22 prostitute?

23 **A.** Yes.

24 **Q.** How do you know that it was February of 2011 when you
12:16:47 25 worked there as a prostitute?

1 **A.** Because I arrived in Houston on January 27th.

2 **Q.** Of 2011?

3 **A.** Yes. And a week later I started working.

4 **Q.** Who hired you there at the -- at the Las Palmas?

12:17:28 5 **A.** I just arrived to work there because my pimp told me
6 the job was ready for me and that a taxi would take me
7 there.

8 **Q.** Did, in fact, a taxi take you there?

9 **A.** Yes.

12:17:45 10 **Q.** And when you arrived at the Las Palmas, did you talk
11 to anybody there about working there?

12 **A.** Yes, with a person in charge, the man in charge.

13 **Q.** And who was that person in charge, if you know?

14 **A.** His name is Juan.

12:18:11 15 **Q.** Was he the manager there at Las Palmas?

16 **A.** Yes.

17 **Q.** Was there an owner of Las Palmas?

18 **A.** Yes.

19 **Q.** Is the owner of Las Palmas here today?

12:18:29 20 **A.** Yes.

21 **Q.** Did you know the name of the owner of Las Palmas?

22 **A.** She is called Tencha.

23 **Q.** Is Tencha in the courtroom here today?

24 **A.** Yes.

12:18:43 25 **Q.** Will you please point to her and describe what she is

1 wearing for the Court, please?

2 **A.** (Speaking Spanish.)

3 **Q.** You can point to her.

4 **A.** Over there. She is wearing a black jacket.

12:19:10 5 MR. PEREZ: Your Honor, may the record reflect
6 this witness has identified the defendant, Your Honor?

7 THE COURT: The record will so reflect.

8 **Q.** (By Mr. Perez) Let me ask you this: Did you see
9 Tencha there at the brothel?

12:19:32 10 **A.** Yes.

11 **Q.** And you said that you knew her as the owner of Las
12 Palmas. How do you know she was the owner of Las Palmas?

13 **A.** Because I accompanied Juan, the man that was in charge
14 there with whom I spoke of at the beginning. I
15 accompanied him to her house to leave some money for her
16 because he said, "Let's go leave some money for the
17 owner."

18 **Q.** And did you go to her place?

19 **A.** Yes. I accompanied him. I stayed in the car, but we
20 went to her house.

21 **Q.** Did your pimp know that you had gone with Juan to
22 Tencha's house?

23 **A.** No.

24 **Q.** How old were you when you worked there at Las Palmas?

12:20:42 25 **A.** 16.

1 **Q.** How much did you charge there at Las Palmas as a
2 prostitute for each sex act?

3 **A.** \$70.

4 **Q.** And was there any of that money that had to go to Las
5 Palmas?

6 **A.** Yes.

7 **Q.** How much money of that \$70 would go to Las Palmas?

8 **A.** \$20.

9 **Q.** Would you be handed out condoms there for each sex act
10 when you worked at Las Palmas?

11 **A.** Yes.

12 **Q.** Do you know how much was charged for the condom?

13 **A.** It was \$5.

14 **Q.** Any money that was used to pay for the room?

15 **A.** Yes. \$5 for the condom and \$15 for the room.

16 **Q.** Did you work there the whole week or just on weekends?

17 **A.** The whole week. We only had Tuesdays off.

18 **Q.** And from what time to what time would you work there
19 daily at Las Palmas?

20 **A.** Weekends we went in early. So it depends.

21 **Q.** What time would you start on the weekends?

22 **A.** 1:00 or 2:00.

23 **Q.** What time would you get off on the weekends?

24 **A.** What time we were leaving?

25 **Q.** Yes.

1 **A.** Weekends, 3:00 or 4:00 a.m.

2 **Q.** How about during the week?

3 **A.** 2:00 a.m. or 1:00 a.m.

4 **Q.** And the condom and the use of the room was for what?

12:23:01 5 15 minutes per sex act?

6 **A.** Yes.

7 **Q.** Let me ask you this: On a typical Saturday night,
8 during the time that you worked there, how many girls
9 worked as prostitutes there on a Saturday night?

12:23:27 10 **A.** I didn't understand the question.

11 **Q.** Okay. You worked there as a prostitute on, say,
12 Saturday night. Okay. How many other girls worked there
13 as prostitutes on a Saturday night?

14 **A.** I don't know how many worked. I didn't count them.

12:23:45 15 **Q.** Was there just one or two?

16 **A.** No.

17 **Q.** Many more than that?

18 **A.** Yes.

19 **Q.** And all of them would go in there for every 15 minutes
12:23:56 20 just like you would, right?

21 **A.** Yes.

22 **Q.** I know this is really hard, ma'am. I'm trying to --
23 the jury needs to know. Okay. But how many men would you
24 serve, say, on a Saturday night?

12:24:30 25 **A.** About ten or more.

1 **Q.** So you worked on Saturday, say, from 2:00 to 5:00 in
2 the morning. Was it every 15 minutes that you would
3 service a man as a prostitute?

12:25:00 4 **A.** Not exactly every 15 minutes. That's the time we
5 spent in the room. When we left the room, it would take
6 about ten minutes for another client to come to the room.

7 **Q.** You say you saw Tencha there at Las Palmas, right?

8 **A.** Yes.

12:25:46 9 **Q.** Did you ever have a conversation with Tencha at Las
10 Palmas?

11 **A.** Yes. On one occasion she scolded me.

12 **Q.** Why did she scold you? What did she tell you?

13 **A.** I was at the entrance. She arrived; and she said,
14 "What are you doing here? What privileges are you going
15 to get here? Go inside." And so all I did was to obey
16 her, and I went in.

17 **Q.** Why were you standing by the door?

18 **A.** Sometimes I would get tired of being inside sitting
19 down. So I would just go outside.

12:26:40 20 **Q.** And how old were you at the time, ma'am?

21 **A.** I was 16.

22 **Q.** On a typical Saturday night you said you serviced X
23 number of men. How much money would you give to your pimp
24 there on a Saturday night after you finished your shift
25 there at Las Palmas?

1 **A.** Everything. He would just give me money for the taxi,
2 about \$20.

3 **Q.** Okay. How much do you think -- I mean, how much would
4 you give him total in U.S. dollars?

12:27:34 **A.** Daily I would give him about \$600.

6 **Q.** Would it be more on Saturday night?

7 **A.** On weekends there was more money, \$700 or more.

8 **Q.** I'm going to ask you if you can identify somebody's
9 picture on P-36, please. Can you identify the person on

12:28:32 10 P-36?

11 **A.** Yes.

12 **Q.** Who is the person depicted on 36, P-36?

13 **A.** He is the one who gave us the condoms. He was the one
14 who gave us the condoms and whatever we needed to go into
15 the room.

16 **Q.** What would you need to get into the room?

17 **A.** We needed a condom and toilet paper.

18 **Q.** How about P-35?

19 **A.** Yes, I know him.

12:29:27 20 **Q.** And who is the person depicted on P-35?

21 **A.** He is the manager or was the manager.

22 MR. PEREZ: Can I have a moment, Your Honor?

23 THE COURT: Yes, sir.

24 MR. PEREZ: One moment, Your Honor, please.

12:30:31 25 **Q.** (By Mr. Perez) I hand you what's been marked as P-34.

1 Do you recognize P-34, ma'am? It's right here.

2 **A.** If I know it?

3 **Q.** Yes. Do you know what P-34 is -- I mean, what 34 is?

4 **A.** No.

12:30:57 5 MR. PEREZ: May I have a moment, Your Honor?

6 (Sotto voce discussion between counsel.)

7 MR. PEREZ: Your Honor, I'm going to pass the
8 witness to save time, subject to one more exhibit, Your
9 Honor.

12:31:28 10 THE COURT: All right. I'll allow him to reserve
11 that. Go on.

12 MR. FAZEL: Yes, sir.

13 **CROSS-EXAMINATION**

14 BY MR. FAZEL:

12:31:33 15 **Q.** Ma'am, good morning.

16 **A.** Good morning.

17 **Q.** I have a few questions for you. If you don't
18 understand me, let me know; and I'll repeat myself. Okay?

19 **A.** Yes.

12:31:49 20 **Q.** So that I understand, just briefly -- I don't want to
21 spend much time with it -- in Mexico you met your pimp,
22 correct?

23 **A.** Yes.

24 **Q.** And then you decided at some point in time in order to
12:31:57 25 make him happy that you would agree with what he wanted

1 you to do, which is to prostitute?

2 **A.** Yes.

3 **Q.** Okay. And then you prostituted in Mexico and decided
4 to come to the United States, correct?

12:32:13 5 **A.** Yes.

6 **Q.** Okay. And then he set up the trip from Mexico to the
7 United States for you, correct?

8 **A.** Yes.

9 **Q.** And you and he travelled from Mexico to the United
10 States, correct?

11 **A.** Yes.

12 **Q.** Now, the first time you attempted to travel to the
13 United States you were stopped by immigration, correct?

14 **A.** Yes.

12:32:37 15 **Q.** You were sent back to Mexico, correct?

16 **A.** Yes.

17 **Q.** And then you decided that even though you were sent
18 back to Mexico you were going to come back again, correct?

19 **A.** Yes. He told me that we should try to do it again.

12:32:57 20 **Q.** No. I understand that. But you decided to accompany
21 him again when you were deported back to Mexico?

22 **A.** Yes. Yes.

23 **Q.** Were you deported back together in the same bus?

24 **A.** Yes.

12:33:12 25 **Q.** So immigration sent you back to Mexico in the same

1 bus? You arrived at the same time on the same bus?

2 **A.** Yes.

3 **Q.** Are you all from the same part of Mexico?

4 **A.** What did you say?

12:33:30 5 **Q.** Are you from the same locations in Mexico? You and
6 your pimp, were you born in the same part of Mexico?

7 **A.** No.

8 **Q.** Where did immigration drop you off when they deported
9 you from the United States the first time?

12:33:47 10 **A.** I don't understand.

11 **Q.** When you were caught by immigration the first time
12 crossing and they took you back to Mexico.

13 **A.** It left us together.

14 **Q.** Where?

12:34:09 15 **A.** Just crossing the crossing point or the bridge.

16 **Q.** All right. I'll move on. The second time you came
17 back, tried to come back to the United States, you were
18 successful and you entered the country, correct?

19 **A.** Yes.

12:34:27 20 **Q.** And then you came here to the United States where he
21 had family, correct?

22 **A.** Yes.

23 **Q.** And you lived with him and his family, correct?

24 **A.** Yes.

12:34:39 25 **Q.** How long did you live in that apartment?

1 **A.** About a month.

2 **Q.** How long were you at -- did you work at Las Palmas?

3 **A.** About the whole month that I was living there.

4 **Q.** So when you testified today about your activities, you
5 were at Las Palmas for no more than one month, correct?

6 **A.** Could you repeat, please?

7 **Q.** When you testified earlier for the prosecution, your
8 testimony is based on one month and only one month at Las
9 Palmas, correct?

10 **A.** Yes.

11 **Q.** All right. Now, during that time you said that you
12 had a taxi take you to Las Palmas, correct?

13 **A.** Yes.

14 **Q.** Who arranged for that?

15 **A.** My pimp.

16 **Q.** Let me back you up. When you were coming into the
17 United States, you stayed at a house prior to coming and
18 making it to Houston, correct?

19 **A.** Yes.

20 **Q.** At that house were friends of your pimp, correct,
21 individuals that were friends of your pimp, correct?

22 **A.** I don't know, but they were part of the group of
23 coyotes that were going to bring us to Houston.

24 **Q.** And your pimp was familiar with them?

25 **A.** I think so because he made all the arrangements with

1 them.

2 **Q.** He also did something else while you were in that
3 house. He got you a fake ID, didn't he? "He" being your
4 pimp.

12:36:30 5 **A.** (Speaking Spanish.)

6 **Q.** No, ma'am.

7 **A.** When I was living in the apartment in Houston?

8 **Q.** No, ma'am. In the stash house.

9 **A.** I don't understand.

10 **Q.** While you were at the stash house, before you came to
11 Houston, did your pimp not arrange and obtain a fake ID
12 for you?

13 **A.** Yes.

14 **Q.** And that fake ID showed you to be 22 years old,
15 correct?

16 **A.** 21 or 22, yes.

17 **Q.** When you arrived in Houston and your pimp told you
18 where to go, the first time you got there, did you get
19 there with a cab?

20 **A.** Can you tell me again?

21 **Q.** Sure. When you arrived in Houston and your pimp told
22 you where to go to engage in prostitution, did you go to
23 that location in a taxicab?

24 **A.** Yes.

25 **Q.** And when you arrived -- when you arrived there,

1 somebody went in and asked that you work there, correct?

2 **A.** When I arrived at Las Palmas, I arrived with another
3 girl. The one who was going to explain things to me was
4 the girlfriend of one of his friends. So she helped me go
5 into Las Palmas so that I could talk to the person in
6 charge.

7 **Q.** Okay. So what we can tell is that your pimp had other
8 friends or family members who were also pimping, correct?

9 **A.** Yes.

10 **Q.** And they had girls that they were sending, as well,
11 correct?

12 **A.** Yes.

13 **Q.** And you were going as part of that group, correct?

14 **A.** Yes.

15 **Q.** And there were other girls with other pimps that were
16 also at Las Palmas, correct?

17 **A.** Yes.

18 **Q.** A separate group unrelated to your group, correct?

19 **A.** What did you say?

20 **Q.** A separate group of pimps, a separate group of girls
21 unrelated to you, correct?

22 **A.** I don't understand you.

23 **Q.** Okay. You came to Las Palmas with three girls,
24 correct?

25 **A.** Yes. There were three of us in total.

1 **Q.** There were other girls coming in with taxis or other
2 vehicles that belonged to other pimps, correct?

3 **A.** The three of us were in the same taxi.

4 **Q.** Not you three. There were more than three girls at
5 Las Palmas, correct?

6 **A.** Yes.

7 **Q.** Those girls also arrived in taxis or cars, correct?

8 **A.** Yes.

9 **Q.** And those girls belonged to other pimps, correct?

10 **A.** Yes.

11 **Q.** And those two groups were completely separate,
12 correct?

13 **A.** I don't know if they knew one another.

14 **Q.** Okay. They went to different apartments?

15 **A.** Yes.

16 **Q.** And paid their own pimps?

17 **A.** Yes.

18 **Q.** Now, you also testified that at some point in time you
19 were able to leave with Juan to go to the house of
20 Ms. Medeles. Do you remember that? You call her Tencha.
21 Do you remember that?

22 **A.** Yes.

23 **Q.** You said you stayed in the car; and he went inside,
24 correct?

25 **A.** Yes.

1 **Q.** Okay. Did you see what happened inside the house?

2 **A.** (Speaking Spanish.)

3 **Q.** Did you see who was -- I'm sorry.

4 **A.** No. I stayed in the car.

12:41:08 **Q.** Did you see who was inside the house?

6 **A.** She came out to the door to receive it.

7 **Q.** My question was: Did you see who else was in the
8 house?

9 **A.** Who else was in the house? No, I didn't see who else
10 was there.

11 **Q.** Okay. Now, as far as your activities outside the bar,
12 would it be fair to say that you were able to do other
13 things that your pimp didn't know about, like go places,
14 the mall or other things that your pimp didn't know about?

12:41:48 **A.** Yes.

16 **Q.** So I understand that you made a decision because you
17 loved your pimp. I appreciate that. But it was a
18 volitional decision on your part because you loved him?

19 **A.** Yes.

12:42:22 20 MR. FAZEL: Pass the witness.

21 **REDIRECT EXAMINATION**

22 BY MR. PEREZ:

23 **Q.** I want to show you what's been marked as Government
24 Exhibit Number 50. He asked you about some identification
25 that your pimp obtained for you. Is this a copy of the

1 fake ID that your pimp got for you?

2 **A.** (Nodding head up and down.)

3 **Q.** You have got to raise your voice, please.

4 **A.** Yes.

12:42:52 5 **Q.** And then, I hand you what's been marked as Government
6 Exhibit 34a. Do you recognize what 34a is?

7 **A.** It's a birth certificate.

8 **Q.** Is that your birth certificate?

9 **A.** Yes.

12:43:09 10 **Q.** Okay. And what date of birth does this show on the
11 birth certificate?

12 MR. FAZEL: Judge, I'm sorry. Before she
13 testifies to that, can I see the birth certificate?

14 THE COURT: Yes. Let him take a look at it.

12:43:24 15 MR. FAZEL: I have got no objections to 50. Do
16 you have the original? This is a copy. Just asking.

17 Can we approach just three seconds?

18 THE COURT: Hold on a second. Let me.

19 (Proceedings held at sidebar.)

12:43:56 20 MR. FAZEL: Your Honor, this is what they want to
21 introduce into evidence, 34.

22 THE COURT: Speak up a little bit.

23 MR. FAZEL: Yes, sir. 34a, my objection to this
24 is that not only is it not an original copy, it is a faxed
25 copy. I don't know where it came from. It's not

1 certified.

2 THE COURT: What do you mean it's not certified?

3 MR. FAZEL: Well, I think under hearsay rules if
4 it's a foreign document or if it's a public record, as
5 long as it's certified showing it to be so, then it's
6 admissible as an exception to the hearsay rule. I would
7 submit this does not fit that description because it's the
8 copy, and I can't tell what it is.

9 Third of all, it's not translated into English.

10 12:44:30 For all those reasons, I would object to this document
11 coming into evidence.

12 12:44:44 MR. PEREZ: Your Honor, she identified that as
13 her birth certificate. That's all I can tell the Court.
14 He keeps objecting that it's not certified. That is
15 certified.

16 16 MR. FAZEL: It is certified as something that is
17 certified with a certified stamp on it.

18 THE COURT: I'm not saying it's certified or not.

19 12:44:53 MR. FAZEL: And I'm not sure she can say this is
20 hers or that she is qualified to say that. She read a
21 document. I don't think he did, but I could make this in
22 my office in three seconds.

23 23 MR. MAGLIOLO: Your Honor, the rules don't
24 require it to be an original. It just has to have the
25 sufficient indicia of reliability, Your Honor. It's a --

1 this appears to be a Mexican birth certificate.

2 THE COURT: All right. You object to 34a?

3 MR. FAZEL: I do.

4 THE COURT: Overruled.

12:45:26 5 MR. FAZEL: Yes, sir.

6 (Proceedings concluded at sidebar.)

7 MR. PEREZ: At this time, the United States would
8 offer into evidence Government Exhibit 34a.

9 THE COURT: It's admitted.

12:45:42 10 MR. PEREZ: For security reasons, Your Honor, I
11 will, with the Court's permission, substitute 34 for 34a
12 with some of the parts redacted, Your Honor.

13 THE COURT: All right.

14 Q. (By Mr. Perez) I think the defense attorney asked you
15 whether you worked there for a short period of time.

16 A. What did you say?

17 Q. You said the defense attorney told --

18 THE INTERPRETER: Sir, is it on?

19 Q. (By Mr. Perez) The defense attorney told you that you
20 only worked there from February 2011. Do you remember
21 that?

22 A. Yes.

23 Q. Were you rescued?

24 MR. FAZEL: I object to the term "rescued," Your
25 Honor.

1 THE COURT: The term what?

2 MR. FAZEL: I object to the question. I object
3 to the term "rescued." It's a sidebar comment.

4 THE COURT: All right. Rephrase it. State it
12:46:45 5 again.

6 Q. (By Mr. Perez) Were you able to escape that life as a
7 prostitute?

8 A. Yes.

9 Q. Tell the members of the jury how you were able to
12:46:54 10 escape your life as a prostitute.

11 A. We arrived at the apartment where I was staying. Two
12 police and people from the FBI --

13 Q. The fellow behind me, Edwin, did he show up, as well?

14 A. Yes.

15 Q. Okay.

16 A. Yes.

17 Q. He showed up at the apartment where you were?

18 A. Yes. They arrived there, yes.

19 Q. Did they ask you questions?

20 A. Yes.

21 Q. At the beginning, did you tell them the truth?

22 A. No. At the first -- at the beginning I was lying
23 about my age.

24 Q. Why did you lie to them?

12:48:00 25 A. Because my pimp had told me that if ever anyone asked

1 me how old I was, I should say 21.

2 **Q.** And this was a perfect opportunity to escape from this
3 situation. Why didn't you tell them the truth so you
4 could escape from the beginning?

12:48:22 5 THE INTERPRETER: I'm sorry, Your Honor. I can't
6 hear, Your Honor. I'm sorry.

7 THE COURT: Your mic, is it --

8 MR. PEREZ: The green light is on, Your Honor.

9 THE COURT: Oh, that was the bench conference.

12:48:38 10 All right. Thank you for bringing it to my attention.

11 THE INTERPRETER: Thank you, sir.

12 THE COURT: I was hearing him, but I can see
13 where it doesn't carry. All right. Go on.

14 **Q.** (By Mr. Perez) Mr. Edwin Chapuseaux shows up at your
15 location along with the FBI and they talked to you --
16 before the mic went off -- and you told us that you lied
17 to them about your age, right?

18 **A.** Yes.

19 **Q.** I asked you why did you lie about your age and your
20 answer was, repeat it, please?

21 **A.** Because my pimp had told me that if anybody ever asked
22 me how old I was, I should say that I was already 21.

23 **Q.** And again, this was a perfect opportunity for you to
24 escape the life of prostitution. Initially, why did you
25 not open up and tell Deputy Edwin what had happened to

1 you?

2 **A.** I don't know. It's just that I loved my pimp a lot.
3 I wanted to -- I was in love with him. I wanted to stay
4 with him. That's why I was lying. But afterwards, I told
5 the truth.

12:50:21

6 **Q.** How long did it take you to tell the truth to Deputy
7 Edwin?

8 **A.** About ten minutes.

9 **Q.** And after ten minutes, did you tell him the truth?

12:50:39

10 **A.** Yes. Because truth is, I didn't want to go on working
11 like that.

12 **Q.** And since he rescued you, have you worked as a
13 prostitute?

14 **A.** No.

12:50:54

15 **Q.** How is your life now, compared to the life that you
16 lived as a prostitute there at Las Palmas?

12:51:44

17 **A.** Well, it's already much better. I have my family. I
18 have a daughter, and I think about her a lot. I don't
19 trust anybody. And it's much better. I'm with my mother
20 now. I'm not with so many men. And I don't suffer that
21 way.

22 **Q.** You don't live in the United States anymore, right?

23 **A.** No.

24 **Q.** You went back to Mexico?

12:51:59

25 **A.** Yes.

1 Q. And we brought you in from Mexico just for your
2 testimony here today before the members of the jury; is
3 that correct?

4 | A. Yes.

12:52:10 5 Q. And after you testify, you are going to go back to
6 Mexico and live your life as best as you can in Mexico
7 without being a prostitute?

8 | A. Yes.

9 Q. Do you now believe that all the things your pimp told
10 you was the truth?

11 | **A.** No. Everything was a lie.

12 MR. PEREZ: I pass the witness, Your Honor.

13 MR. FAZEL: I just want to make sure I'm clear on
14 this, ma'am.

CROSS-EXAMINATION

16 BY MR. FAZEL:

17 Q. You were under the control of your pimp the entire
18 time you were in the United States, correct?

19 A. Yes.

12:52:56 20 Q. Ms. Medeles had nothing to do with you coming into the
21 United States or any of the money that you gave your pimp,
22 correct?

23 MR. PEREZ: Objection, Your Honor. That's
24 repetitious. Your Honor.

12:53:05 25 THE COURT: Sustained.

1 MR. FAZEL: I pass the witness.

2 THE COURT: Anything further?

3 MR. PEREZ: No, Your Honor.

4 THE COURT: Thank you. You may step down. You
12:53:10 5 are excused. You are free to leave.

6 Do you have another witness available?

7 MR. PEREZ: Yes, Your Honor.

8 THE COURT: I think we might ought to start. I
9 have two matters set that I will be in here at 2:00 to
12:53:22 10 hear. So let's go to, if we can, maybe 1:10 or something
11 like that, if that's okay, 1:15, so I don't take it out of
12 your time and leave you in there with the two other
13 matters that I think are at 2:00.

14 Is everybody okay with that?

12:53:40 15 JURORS: Yes.

16 THE COURT: We'll go to 1:15. Let's call the
17 next witness then, please.

18 MR. PEREZ: XXXXXXXXXXXXXXX, Your Honor.

19 THE COURT: The first name, spell it, please.

20 MR. PEREZ: First name XXXXXXXXX --

21 THE COURT: XXXXX --

22 MR. PEREZ: -- XXXXXXXXXXXXXXX.

23 THE COURT: The last name?

24 MR. PEREZ: XXXXXXXXXXXXXXX, Your Honor.

25 THE COURT: Thank you.

1 MR. PEREZ: Thank you, Your Honor.

2 THE COURT: Ma'am, raise your right hand, please.

3 (Witness sworn by the Court through the interpreter.)

4 THE COURT: All right. Thank you. You can have
12:54:40 5 a seat.

6 THE INTERPRETER: It's a little loud, sir. The
7 headset, it's a little loud.

8 THE COURT: Do you want to try that? Is that
9 better?

10 THE INTERPRETER: Thank you, sir.

11 THE COURT: All right. Let's go, please.

12 MR. PEREZ: Thank you, Your Honor.

13 XXXXXXXXXXXXXXXXXXXXXXXX,

14 having been first duly sworn, testified through the
15 interpreter as follows:

16 **DIRECT EXAMINATION**

17 BY MR. PEREZ:

18 Q. State your name for the Court and the members of the
19 jury, please, ma'am.

20 A. XXXXXXXXXXXXXXXXXXXXXXXX, yes.

21 Q. How old a lady are you, ma'am?

22 A. I am 21. I'm going to be 22 in June.

23 Q. And you are from Mexico? Born in Mexico, right?

24 A. Yes.

25 Q. What is your date of birth?

1 **A.** The 25th of June of '93.

2 **Q.** Where in Mexico were you born?

3 **A.** In Choapas, Veracruz.

4 **Q.** Let me direct your attention to when you were 15 years
12:56:35 5 old. Did you meet a fellow by the name of Clemente
6 Melendez Gitionerrez also known as Rocky?

7 **A.** Yes.

8 **Q.** And where did you meet this fellow?

9 **A.** In Humanguillo, Tabasco, Mexico, yes.

10 **Q.** Where in that place did you meet him?

11 **A.** In a park.

12 **Q.** And eventually did you all engage in some kind of
13 relationship?

14 **A.** Can you repeat the question, please.

12:57:18 15 **Q.** Sure. This fellow that you knew as Rockefeller, did
16 you and he become boyfriend and girlfriend?

17 **A.** We went out twice to get to know each other; and on
18 the third time, that's when he took me to Puebla.

19 **Q.** And how far is Puebla from the park where you met him?

12:57:54 20 **A.** I don't know exactly how many hours.

21 **Q.** Was he older than you, ma'am?

22 **A.** Yes.

23 **Q.** Do you know how old he was at the time that he met
24 you?

12:58:12 25 **A.** No.

1 **Q.** But he was older than you?

2 **A.** Yes.

3 **Q.** And when you went to Puebla, where did you all go when
4 you went to Puebla?

12:58:28 **A.** He took me to a hotel.

6 **Q.** And what happened at that hotel?

7 **A.** He would leave me there. Sometimes he would bring me
8 food.

9 **Q.** And what would you do at the hotel?

12:59:00 **A.** Nothing. I would only stay there and watch TV until
11 he should return. He wouldn't let me do anything.

12 **Q.** Why did you go with him to Puebla? Did he force you
13 to go with him?

14 **A.** Yes.

12:59:22 **Q.** And when you say he forced you, what did he do to make
16 you go to Puebla with him?

17 **A.** He wouldn't let me get out of the car, and he would
18 accelerate more.

19 **Q.** How long did you work -- did you stay there in Puebla
20 at that hotel?

21 **A.** About three months.

22 **Q.** Did you work as a prostitute there at the hotel?

23 **A.** No.

24 **Q.** You and he just lived at the hotel, or what would you
25 do there at the hotel?

1 **A.** He would leave me there at the hotel. I lived there.
2 He would bring me food, and he took me out only once to
3 buy clothes.

4 **Q.** Why didn't you escape from that hotel, or did you want
5 to escape?
01:00:26

6 **A.** I did want to, but I didn't have any money. I didn't
7 know Puebla. I couldn't.

8 **Q.** Do you come from a poor background, ma'am?

9 **A.** Yes.

01:00:56 **Q.** How many brothers and sisters do you have?

11 **A.** Pardon?

12 **Q.** How many brothers and sisters do you have?

13 **A.** In total we are 13.

14 **Q.** Does your -- are your parents still living?

01:01:19 **A.** Only my mother.

16 **Q.** What happened to your father?

17 **A.** My father was killed.

18 **Q.** All right. So you are living there at the hotel.

19 How -- you said you stayed there at the hotel for how
01:01:46 20 long?
21

21 **A.** About three months.

22 **Q.** And after those three months, what happened then?

23 **A.** I was brought to Houston.

24 **Q.** Who brought you to Houston, ma'am?

01:02:02 25 **A.** One of Clemente's friends.

1 **Q.** And up until that point, had you worked as a
2 prostitute?

3 **A.** No.

4 **Q.** You were brought to Houston. When did you come to
5 Houston?

6 **A.** I got to Houston about the end of 2008.

7 **Q.** Where did you work as -- did you work when you arrived
8 in Houston?

9 **A.** Yes.

10 **Q.** Where did you work when you arrived in Houston?

11 **A.** At El Capricho.

12 **Q.** What is El Capricho?

13 **A.** A bar, a brothel.

14 **Q.** I know you are nervous, ma'am. Please take a deep
15 breath. Okay?

16 **A.** Okay.

17 **Q.** Did you work as a prostitute at El Capricho?

18 **A.** Yes.

19 **Q.** You told us that before you arrived in the United
20 States you had not worked as a prostitute, right?

21 **A.** Yes.

22 **Q.** You worked at El Capricho as a prostitute; is that
23 correct?

24 **A.** Yes.

25 **Q.** Who convinced you or why did you work as a prostitute

1 at El Capricho?

2 **A.** Because Clemente would threaten me with doing
3 something to my son and to my family in Mexico.

4 **Q.** Was Clemente here in Houston?

01:04:14 5 **A.** He hadn't gotten here yet.

6 **Q.** So how would he -- explain to the members of the jury
7 how he would control you in that he is in Mexico and you
8 are in the United States?

9 **A.** A girl by the name of Vanessa, as I got to know her,
01:04:44 10 was the one who controlled me. She was the one who would
11 control me. She was the one who she was always watching
12 over me. She was the one who would buy me something to
13 eat, who would tell me how to dress, how much I was going
14 to charge the client and how I was going to tell them.

01:05:57 15 **Q.** How was Vanessa related, if she was, to Clemente?

16 **A.** She -- he told me that they were friends. But when he
17 wasn't there, she was the one who would tell me what to
18 do; and she would scold me.

19 **Q.** How long did you work at the Capricho, ma'am?

01:06:38 20 **A.** Pardon?

21 **Q.** How long did you work at the Capricho?

22 **A.** Truth is, I don't know how long it was that I worked
23 there.

24 **Q.** And after you worked at the Capricho, where did you
01:06:56 25 work next, if you did?

1 **A.** At Las Palmas.

2 **Q.** I'm going to direct your attention to December of 2010
3 to January through November of 2011. Did you work at Las
4 Palmas during that time period?

01:07:21 **A.** Yes.

6 **Q.** How old were you when you worked at Las Palmas?

7 **A.** 16 or 17 years old.

8 **Q.** Who hired you there at Las Palmas?

9 **A.** A girl whose name is Lupier took me there. She told
01:08:06 me she had already spoken --

11 MR. FAZEL: Excuse me, Your Honor. At this time
12 I object to hearsay as to what she said, "she" being the
13 girl.

14 MR. MAGLIOLO: It's a statement in the course of
01:08:16 the conspiracy, Your Honor, and furtherance of the
16 conspiracy.

17 THE COURT: Overrule the objection.

18 **Q.** (By Mr. Perez) Go ahead.

19 **A.** She told me that she had already spoken with
01:08:28 Ms. Tencha.

21 **Q.** What did she tell you that Tencha told her?

22 **A.** That I could go to work over there.

23 **Q.** And did you go, in fact, to work at Las Palmas?

24 **A.** Yes.

01:08:48 **Q.** When you arrived at Las Palmas who, in fact, made

1 contact with you to give you permission to work at Las
2 Palmas?

3 **A.** A man whose name is Manuel.

4 THE WITNESS: Juan.

01:09:13 5 THE INTERPRETER: Oh, Juan.

6 **Q.** (By Mr. Perez) What happened with Juan?

7 **A.** He explained to me how much was charged, where the
8 rooms were at.

9 **Q.** And how much did they charge for the use of the rooms?

01:09:37 10 **A.** \$15 were paid.

11 **Q.** To whom?

12 **A.** The money would be divided from downstairs when you
13 came in and upstairs when they gave you napkins and
14 condoms.

01:10:05 15 **Q.** How much did they charge for the use of the napkin,
16 the condom and the room?

17 **A.** I really don't remember how the money was divided.

18 **Q.** The total amount was how much again?

19 **A.** \$15.

01:10:28 20 **Q.** And how much was the client charged for your services?

21 **A.** \$65 or \$70.

22 **Q.** Now, did you work there only on weekdays or only on
23 weekends or the whole weekends and weekdays, as well?

24 **A.** Everything complete, every day.

01:11:00 25 **Q.** On the weekdays from what time to what time did you

1 work?

2 **A.** Since they opened I would get there, like, about 4:30;
3 and sometimes we would get off at 1:00 or 2:00 in the
4 early morning hours. Sometimes it would --

01:11:33 5 **Q.** What about on the weekends?

6 **A.** Sometimes it would stay open later.

7 **Q.** What about on the weekends, what time? What were your
8 hours on the weekends?

9 **A.** Sometimes 4:00 or 5:00 in the morning.

01:11:52 10 **Q.** Let me ask you this, ma'am: On a typical Saturday
11 night, how many prostitutes would work there at Las
12 Palmas?

13 **A.** More than 25.

14 **Q.** How about during the week?

01:12:18 15 **A.** More or less 20.

16 **Q.** How much money did you make, say, on a Saturday night
17 for you, not that went to the house but you? How much
18 money did you make?

19 **A.** Between \$1,500 and \$2,000.

01:12:44 20 **Q.** That was one Saturday night?

21 **A.** Yes.

22 **Q.** And where would that money go, that money that you
23 would make from prostitution?

24 **A.** To Clemente.

01:12:59 25 **Q.** Was Clemente in Mexico?

1 **A.** He was already here.

2 **Q.** So you would give that money to Clemente?

3 **A.** Sometimes and sometimes I would give it to the other
4 girl.

01:13:24 5 MR. FAZEL: Your Honor, just for clarity, can we
6 say what other girl?

7 THE COURT: Okay. What other girl, please?

8 **A.** Oh, excuse me. Vanessa.

9 **Q.** (By Mr. Perez) How would your pimp control you?

01:13:48 10 **A.** Always through threats and beatings.

11 **Q.** What kinds of threats, ma'am?

12 **A.** With my son, with my family, and he always continues
13 to beat me.

14 **Q.** Would he ask you to do other things other than engage
01:14:21 15 in sex with men?

16 **A.** To drink when he drank and for me to have sex with the
17 persons in front of him.

18 THE COURT: All right. Ladies and gentlemen,
19 it's right at 1:15. I'm going to take our lunch break a
01:14:53 20 little bit later today. Please be back and ready to
21 resume at 2:30. That's an hour and a quarter. We'll see
22 you at that time.

23 THE MARSHAL: All rise.

24 (Jury exited courtroom at 1:15 p.m.)

02:50:23 25 (Lunch break from 1:15 p.m. to 2:50 p.m.)

1 (Jury entered courtroom at 2:50 p.m.)

2 THE COURT: All right. Since an all rise is
3 always appropriate, we're all going to stay standing. I
4 have the honor of introducing to you the absolute newest
02:51:01 5 federal judge in the United States District Court for the
6 Southern District, the Honorable Alfred Bennett.

7 (Applause.)

8 THE COURT: I thought that would be fun. That is
9 where I was. He just got sworn in, and he wanted to come
02:53:06 10 in to see what a more senior judge's chambers looked like.
11 What happened was I -- all the junior judges, I think I
12 told you, start at this floor. But I have stayed here
13 ever since; and every time people move off -- they can't
14 wait to get off the 8th floor -- I take more space. So I
02:53:25 15 am up to my maximum under the design code.

16 They come looking around and say "My goodness, you
17 know, look at all this."

18 I said, "It only took me 29 years to accumulate it."

19 I had a state judge tell me about state court -- and
02:53:40 20 it is generally true in most whatever job we have. He
21 said he was opposed the seniority system until he got
22 some. Okay.

23 Anyhow, I apologize for the lateness. We were
24 visiting here, and I was at the swearing in. So I was
02:53:56 25 glad to visit with the new judge and his family. Okay.

1 So with that as an apology and that's why we are
2 getting underway late, please continue.

3 MR. PEREZ: Thank you, Your Honor.

4 **DIRECT EXAMINATION (continued)**

02:54:05 5 BY MR. PEREZ:

6 Q. You are XXXXXXXXXXXXXXXX. You are the young lady that
7 testified before we took the break, right?

8 THE INTERPRETER: I can't hear.

9 THE COURT: No. The system it should be live.

02:54:26 10 THE INTERPRETER: Yeah.

11 THE COURT: Everybody got it?

12 THE INTERPRETER: Yes, sir.

13 THE COURT: Okay.

14 A. Yes.

02:54:36 15 Q. (By Mr. Perez) Can you identify somebody by the name
16 of Tencha in the courtroom here today?

17 A. (Speaking Spanish.)

18 Q. Would you please identify somebody, if you know
19 somebody, by the name of Tencha? Is she here in the
02:55:03 20 courtroom today?

21 A. Yes.

22 Q. Would you point and describe what she is wearing for
23 the Court, please?

24 THE COURT: What does she look like? Where is
02:55:10 25 she sitting, please? You can stand if you have to. Just

1 describe what she looks like or --

2 THE WITNESS: Right there.

3 THE COURT: -- a little bit of a description.

4 THE WITNESS: She has white hair. She has got
02:55:31 5 earphones on.

6 THE COURT: Okay. All right. Thank you.

7 MR. PEREZ: May the record reflect this witness
8 has identified the defendant, Your Honor?

9 THE COURT: The record will so reflect.

02:55:38 10 MR. PEREZ: Okay.

11 Q. (By Mr. Perez) Now, I'm trying to remember where we
12 were. I have interviewed so many people. But I think you
13 had described that your pimp regularly beat you; is that
14 correct?

02:55:55 15 A. Yes.

16 Q. And I think you also told us that you worked when you
17 were 17 years of age there at Las Palmas 2?

18 A. Can you repeat the question? I can't hear it.

19 Q. Okay. Let me ask it to you this way: How old were
02:56:23 20 you when you worked at Las Palmas?

21 A. About 17.

22 Q. Okay. What is your date of birth, ma'am?

23 A. The 25th of June of '93.

24 Q. Okay. I'm going to hand you Government Exhibit
02:56:50 25 Number 26a. Is Government Exhibit 26a your birth

1 certificate?

2 **A.** Yes.

3 **Q.** And your birth certificate reflects that you were born
4 on what date?

02:57:04 5 **A.** June of 1926.

6 MR. PEREZ: The government offers Government
7 Exhibit 26a, Your Honor.

8 THE COURT: If it's in, it's in. Keep going.

9 MR. PEREZ: Okay.

02:57:24 10 **Q.** (By Mr. Perez) While you were working there at Las
11 Palmas, did you ever see Tencha there at Las Palmas?

12 **A.** Yes.

13 **Q.** Was she the owner of Las Palmas?

14 **A.** Yes.

02:57:39 15 **Q.** Did you ever have any conversation with Tencha?

16 **A.** Only one time. We were there eating and she came and
17 told us that she didn't like us eating there because she
18 didn't like the mess that was left over and that she
19 didn't like us bringing food in, that we had to buy the
02:58:19 20 food from there.

21 **Q.** Now, did you -- let me -- on a typical Saturday night,
22 about how much money did you make there at Las Palmas that
23 you could take to your pimp?

24 **A.** From \$1,500 to \$2,000.

02:58:46 25 **Q.** On one Saturday night?

1 **A.** Yes.

2 **Q.** And again, I know it's embarrassing and I just -- how
3 many men would you service on a typical Saturday night?

4 **A.** I don't remember.

02:59:10 5 **Q.** Do you recall how many men you would service in an
6 hour, typically?

7 **A.** About seven, eight.

8 **Q.** In one hour?

9 **A.** Yes.

02:59:32 10 THE COURT: All right. Move on.

11 **Q.** (By Mr. Perez) Well, how much would you charge these
12 men?

13 **A.** There were several fees, and there would be times when
14 they would pay up to \$200.

03:00:00 15 **Q.** And you were a minor at the time, right?

16 **A.** Yes.

17 **Q.** And how much would the Las Palmas charge for every 15
18 minutes that you would have sex with these men?

19 **A.** I don't understand the question.

03:00:23 20 **Q.** My fault. Okay. How much would you get charged for a
21 condom?

22 **A.** \$15.

23 **Q.** And how much was the room charge?

24 **A.** In total it was \$15. Excuse me.

03:00:42 25 **Q.** That was \$15 for the use of the condom and the use of

1 the room?

2 **A.** Yes.

3 **Q.** And this money would go to Las Palmas?

4 **A.** Yes.

03:00:57 5 **Q.** Were you illegal at the time you worked at Las Palmas?

6 **A.** Yes.

7 **Q.** And were the other women who worked there, if you
8 know, at Las Palmas illegal, as well?

9 **A.** I don't know.

03:01:25 10 **Q.** But you certainly were illegal; is that correct?

11 **A.** Yes.

12 **Q.** Were you arrested in Las Palmas?

13 **A.** Yes.

14 **Q.** Can you tell the members of the jury the circumstances
03:01:52 15 under which you were arrested?

16 **A.** For prostitution.

17 **Q.** And were you charged with prostitution?

18 **A.** Yes.

19 **Q.** I want to show you some pictures on the board. P-29,
03:02:34 20 do you recognize the person depicted on P-29?

21 **A.** I saw him a few times picking up some girls.

22 **Q.** Picking up girls from Las Palmas?

23 **A.** Yes.

24 **Q.** Did he ever go inside?

03:03:01 25 **A.** I don't remember.

1 **Q.** And was he a pimp?

2 **A.** I don't know.

3 **Q.** You certainly saw him there at Las Palmas?

4 **A.** Yes.

03:03:13 5 **Q.** What about P-28, do you recognize the person depicted
6 on P-28?

7 **A.** She was at the bar.

8 **Q.** And what would she do at the bar?

9 **A.** She sold the beer.

03:03:36 10 **Q.** Do you know if she was related to Tencha?

11 **A.** Several times she said she was her niece -- I mean,
12 her aunt.

13 **Q.** What about P-31?

14 **A.** He was in the trailer and in the -- he was in the
03:04:08 15 parking lot, excuse me, in the trailer with the tacos.

16 **Q.** Do you know if he was related to Tencha?

17 **A.** No.

18 **Q.** How about P-35a, do you recognize that fellow?

19 **A.** He is Juan.

03:04:31 20 **Q.** And who is Juan?

21 **A.** He is the one that acted as manager and made meetings
22 with some of them.

23 **Q.** What about P-36? Do you recognize P-36?

24 **A.** Juan Carlos.

03:05:00 25 **Q.** What was his job there at Las Palmas?

1 **A.** To open the door to enter the rooms.

2 **Q.** What about P-73?

3 MR. PEREZ: P-73.

4 MS. POUNCEY: It's not there. It's in the other
03:05:27 book.

6 **Q.** (By Mr. Perez) How about P-74? Do you recognize the
7 person in P-74?

8 **A.** Johnny, the son of the owner of El Capricho.

9 **Q.** Was he a pimp, as well?

10 **A.** Yes.

11 **Q.** How about P-75? Do you recognize the person on P-75?

12 **A.** She worked at El Capricho.

13 **Q.** As a prostitute?

14 **A.** Yes.

15 **Q.** What about P-76?

16 **A.** Johnny's brother.

17 **Q.** And was he also a pimp?

18 **A.** Yes.

19 **Q.** In 2012 did you -- strike that.

20 In 2011 did Edwin -- you know the person behind me,
21 Edwin, right?

22 **A.** Yes.

23 **Q.** In 2011 did he try to rescue you?

24 **A.** Yes.

25 **Q.** Where did he meet you in 2011 the first time?

1 **A.** Excuse me. I'm not remembering too well.

2 **Q.** As I said, take your time, please. I know you are
3 nervous. Let me ask it this way to make it simple. Okay.
4 Were you stopped in a traffic stop?

03:07:42 **A.** Yes.

6 **Q.** And did you talk to Edwin at that time?

7 **A.** Yes.

8 **Q.** Did he try to help you at that time?

9 **A.** Yes.

03:07:56 **Q.** Did you tell him the truth at that time?

11 **A.** No.

12 **Q.** What did you tell him?

13 **A.** That I didn't know anything, that I didn't have
14 anything to say.

03:08:15 **Q.** Why didn't you tell him the truth at that time?

16 **A.** Through fear.

17 **Q.** What kind of fear, ma'am?

18 **A.** What Clemente might do to me or to my family.

19 **Q.** Like what?

03:08:48 **A.** Because he would beat me so badly; and because he
21 would beat me so badly, I felt that he was capable of
22 going to do something either to my son or to my mother.

23 **Q.** Did you again have contact with Edwin, the fellow
24 sitting behind me, in 2012 where he tried to rescue you at
25 that time?

1 **A.** Yes.

2 **Q.** Where were you at the time that Edwin had contact with
3 you in 2012 the second time?

4 **A.** In the hospital.

03:09:43 5 **Q.** Here in Houston?

6 **A.** Yes.

7 **Q.** Why were you in the hospital?

8 **A.** Because I had like a nerve, nervous attack; and I
9 couldn't breathe well.

03:10:08 10 **Q.** So you wound up at the hospital?

11 **A.** Yes.

12 **Q.** And Edwin went to the hospital to try to help you; is
13 that right?

14 **A.** Yes.

03:10:18 15 **Q.** And did you tell Edwin the truth at that time?

16 **A.** Excuse me?

17 **Q.** Did you tell Edwin the truth the second time when he
18 went to visit you in the hospital?

19 **A.** No.

03:10:36 20 **Q.** Why didn't you tell him the truth at that time?

21 **A.** For the same reason. Fear. I didn't dare.

22 **Q.** And I think you made contact with Edwin very recently,
23 in fact, on March 28th of this year, right?

24 **A.** Yes.

03:11:06 25 **Q.** How did you reach out to Edwin on March 28th, 2015?

1 **A.** I talked with a girl and asked her could she get me
2 the number so that I could talk to him, that I wasn't
3 feeling well.

4 **Q.** And did you, in fact, call Edwin, the fellow sitting
5 behind me, seeking help?

6 **A.** Yes.

7 **Q.** Did he talk to you?

8 **A.** Yes.

9 **Q.** Did you and he meet?

10 **A.** Yes.

11 **Q.** In fact, this phone call was on a Saturday; is that
12 correct?

13 **A.** Yes.

14 **Q.** Where did you all meet on March 28th, that Saturday?

15 **A.** We met on a Sunday.

16 **Q.** So you called him Saturday, and you all met Sunday?

17 **A.** Yes.

18 **Q.** Where did you all meet on Sunday?

19 **A.** At my friend's house.

20 **Q.** And at that time, did you tell him the truth as to
21 what had happened to you?

22 **A.** Yes.

23 **Q.** Tell the members of the jury why he tried to make
24 contact with you in 2011, tried to help -- tried to rescue
25 you then, tried to rescue you in 2012 and you didn't reach

1 out to him until a couple of weeks ago. Why?

2 **A.** Because about a year ago I escaped. My husband helped
3 me. He always told me to file on him, to look for help
4 because I was always not feeling well. All of that
5 affected me a lot. And my mother told me over there that
6 in Mexico they had gone twice looking for my son saying
7 that I had sent them to look for him. And they have been
8 watching my sister, and they have gone to knock on her
9 door at home trying to get in.

03:13:42 10 **Q.** Do you know who "they" are or is? Who is "they"?

11 **A.** I don't know them.

12 **Q.** Do you know this fellow that's your pimp -- he comes
13 from a pimping family; is that right?

14 **A.** Yes.

03:14:57 15 **Q.** Even though you didn't reach out or you didn't tell
16 Edwin the truth in 2011 and 2012, did you tell him the
17 truth on March 28th?

18 **A.** Yes.

19 **Q.** Were you telling the members of the jury the truth as
03:15:17 20 to what happened to you?

21 **A.** Yes.

22 **Q.** You hesitated a little bit. Can you tell the members
23 of the jury why?

24 **A.** Because it hurts me a lot to remember all of this. It
03:15:44 25 makes me feel badly.

1 Q. Did you know we were starting trial on Tencha when you
2 called Deputy Edwin?

3 A. No.

4 MR. PEREZ: I'll pass the witness, Your Honor.

03:16:02 5 MR. FAZEL: May I proceed, Your Honor?

6 THE COURT: Yes, sir.

7 **CROSS-EXAMINATION**

8 BY MR. FAZEL:

9 Q. Ma'am, did you -- do you have water up there?

03:16:19 10 THE COURT: Microphone, please.

11 THE WITNESS: (Nodding head side to side.)

12 MR. FAZEL: No.

13 THE INTERPRETER: She has got one.

14 Q. (By Mr. Fazel) Are you okay?

03:16:58 15 A. Yes.

16 Q. Okay. I'm going to ask you some questions; and if you
17 need a break or if you need some water, help yourself. If
18 you don't understand me, let me know; and I'll repeat
19 myself. Okay?

03:17:15 20 A. Okay.

21 Q. I'm going to touch briefly on what happened to you in
22 Mexico with your pimp. Okay?

23 A. Okay.

24 Q. You have testified that your date of birth is
03:17:33 25 6-25-1993?

1 **A.** 25.

2 **Q.** Right. 25 of the sixth month of 1993?

3 **A.** Yes.

4 **Q.** When I have -- as part of discovery, as part of what
03:17:49 5 the government has shown me, I have seen your A-file or
6 your immigration file. Okay?

7 **A.** Okay.

8 **Q.** What is confusing to me is throughout that file the
9 United States immigration shows your date of birth to be
03:18:06 10 6-25-1989. Can you explain why that is?

11 **A.** Because the pimp that I used to be with got me a false
12 identification, and that's what he gave me to use wherever
13 I went.

14 **Q.** Okay. So you used a false identification when you
03:18:42 15 worked at these locations, at Las Palmas and all these
16 other locations, correct?

17 **A.** Yes.

18 **Q.** I understand. That showed you to be, what, 22, 23?

19 **A.** Yes.

03:18:56 20 **Q.** But what is confusing to me is your federal
21 document -- when you started to assist the government and
22 give them information, did they begin to help you with
23 your immigration status and trying to obtain a T-visa to
24 stay in the country?

03:19:18 25 **A.** Can you repeat the question?

1 **Q.** Sure. Once you started cooperating with the
2 government, they started to assist you with your -- you
3 are currently living in the country right now, in the
4 United States, correct?

03:19:30 5 **A.** Yes.

6 **Q.** And you have an immigration lawyer, correct?

7 **A.** Yes.

8 **Q.** And he is trying to obtain some kind of status so you
9 can stay in the country, correct?

03:19:44 10 **A.** Yes.

11 **Q.** Okay. In looking through those documents, they still
12 show your date of birth to be 6-25-1989. Do you know why
13 that is?

14 **A.** Because in the false one that was made for me, that's
03:20:08 15 the date that they put on there.

16 **Q.** No. I understand you had a false ID with that date.
17 But your documents that are requesting the government of
18 this country to allow you to stay in the country still
19 show you to be 6-25-1989. There is no need to lie there,
03:20:25 20 is there?

21 **A.** That was the ID that I had, and that was what Clemente
22 said I had to use and show everywhere.

23 **Q.** Okay. Let me move on. It was -- just so that we're
24 clear on this, I want to get a good time frame on this.
03:20:55 25 It was Clemente who brought you into the United States,

1 correct?

2 **A.** Yes.

3 **Q.** And he arranged for that, correct?

4 **A.** Yes.

03:21:05 5 **Q.** And when you came into the United States, he arranged
6 for a location for you to stay, correct?

7 **A.** Yes.

8 **Q.** And I think you said that he wasn't here in the
9 beginning; and a woman by the name of Vanessa was here,

03:21:21 10 correct?

11 **A.** Yes.

12 **Q.** And Vanessa is the one that told you where to go,
13 correct?

14 **A.** Yes.

03:21:31 15 **Q.** Would tell you where to buy clothes from?

16 **A.** Yes.

17 **Q.** Buy you food?

18 **A.** Yes.

19 **Q.** What to charge the clients in these bars, right?

03:21:44 20 **A.** Excuse me?

21 **Q.** What to charge?

22 **A.** Yes.

23 **Q.** Now, it was either Clemente or Vanessa or whoever in
24 their group that was controlling you at the time that
03:22:01 25 would allow you to go to the bars to work, correct?

1 **A.** Yes.

2 **Q.** And it was them, Clemente or whoever in their group,
3 that would tell you which bar to go to, correct?

4 **A.** Yes.

03:22:17 5 **Q.** So Ms. Medeles here or Tencha, as you call her, she
6 had no control of mandating or making you come to the bar,
7 correct?

8 **A.** No.

9 **Q.** No as in she had no way of forcing you? It was
03:22:32 10 Clemente that forced you, correct?

11 **A.** Yes.

12 **Q.** As a matter of fact, when you were arrested at Las
13 Palmas, you moved to another location to engage in
14 prostitution, correct?

03:22:49 15 **A.** Yes.

16 **Q.** And you stayed at that location pursuant to the orders
17 or mandates of your pimp, correct?

18 **A.** Yes.

19 **Q.** And it wasn't Ms. Medeles that told you to go to that
03:23:03 20 other location, correct?

21 **A.** No.

22 **Q.** It wasn't Ms. Medeles that told you what to charge the
23 individuals that you engaged in prostitution with,
24 correct?

03:23:21 25 **A.** No.

1 **Q.** During your time at Las Palmas, tell me about how long
2 you were there.

3 **A.** More or less one year.

4 **Q.** In that one-year period, you would engage in sexual
5 activities upstairs on the second floor, correct?

6 **A.** Yes.

7 **Q.** And at no time during that time when you were up there
8 were there women locked up in a dorm somewhere, was there?

9 **A.** No.

10 **Q.** At no time at that location did you encounter
11 anybody -- any security guards with guns, did you?

12 **A.** One time when they came in to steal.

13 **Q.** The robbers had guns?

14 **A.** Yes.

15 **Q.** But there wasn't anybody that was a security guard for
16 Las Palmas that had guns, correct?

17 **A.** The security man.

18 **Q.** The security guard. There was a security guard, but
19 was he armed?

20 **A.** Yes. Yes.

21 **Q.** Was he in charge of making sure that you stayed at the
22 bar, or was he there to protect the bar?

23 **A.** I don't know.

24 **Q.** Well, did you feel like you had to stay there because
25 you were afraid of the security guard; or did you feel

1 like you had to stay there because your pimp made you?

2 **A.** I finished working there, and I would leave.

3 MR. FAZEL: Well, no. I think she said (Speaking
4 Spanish).

03:25:31 5 **Q.** (By Mr. Fazel) He would take you? Your pimp would
6 take you, correct?

7 **A.** Sometimes.

8 **Q.** But the security guard never took you home, correct?

9 **A.** No.

03:25:41 10 **Q.** It was your pimp that would arrange the rides for you
11 to the house?

12 **A.** Yes.

13 **Q.** Let's be clear. Ms. Medeles or who you call Tencha
14 was not your pimp, correct?

03:26:10 15 **A.** No.

16 **Q.** She has nothing to do with the threats that you're
17 receiving or were receiving in Mexico, does she?

18 **A.** I don't know.

19 **Q.** Do you have any reason to believe she has any people
03:26:24 20 or family members in Mexico?

21 **A.** No.

22 **Q.** Okay. Did she ever threaten you in any way?

23 **A.** No.

24 **Q.** It was your pimp that always threatened you, correct?

03:26:40 25 **A.** Yes.

1 **Q.** And it's your pimp that told you that if you didn't do
2 what he asked you to do that he would hurt you or your
3 family members, correct?

4 **A.** Yes.

03:26:52 **Q.** And even if we assume that your testimony is accurate
5 and you were born in 1993, you had a child when you met
6 your pimp originally, correct?

7 **A.** I already had my baby.

8 **Q.** And how old was he at the time?

03:27:18 **A.** I was 15.

11 **Q.** And how old was your baby?

12 **A.** One year.

13 **Q.** Okay. So your pimp used that to his advantage and
14 threatened your baby and your family, correct?

03:27:35 **A.** Yes.

16 **Q.** It wasn't Tencha, was it?

17 **A.** No.

18 MR. FAZEL: I pass the witness.

19 **REDIRECT EXAMINATION**

03:27:40 20 BY MR. PEREZ:

21 **Q.** Ma'am, the security guard who worked there at Las
22 Palmas, the one with the gun, he worked for Tencha, right?

23 **A.** Yes.

24 **Q.** And what Tencha did control over you was whether or
25 not she benefited financially from the pimps working you

1 there as a prostitute at Las Palmas, right?

2 MR. FAZEL: I object to the form of the question.
3 Asks for speculation. It's a legal conclusion.

4 MR. PEREZ: If you know.

03:28:13 5 THE COURT: Okay. Hold it. Rephrase it.

6 MR. PEREZ: Okay.

7 Q. (By Mr. Perez) The bottom line is that he asked you
8 whether the pimps had any control over Tencha?

9 MR. FAZEL: I don't believe I asked that.

03:28:25 10 A. Excuse me?

11 Q. (By Mr. Perez) The money that was made there at Las
12 Palmas that went to Las Palmas went to Tencha, right?

13 A. Yes.

14 Q. Now, I think the defense attorney keeps saying that
03:28:44 15 this T-visa that you applied for that was arranged through
16 -- by the government through Edwin, right? That's what he
17 is asking?

18 A. Yes.

19 Q. Edwin had nothing to do with you going to try to get a
03:28:57 20 T-visa from the government, right?

21 A. No.

22 Q. In fact, you just opened up to Edwin, what, two weeks
23 ago? You just made contact with him two weeks ago?

24 A. Yes.

03:29:12 25 Q. And up until that point, you had told Edwin your name

1 was XXXXXXXXXXXXXXXXXXXXXXXX, right?

2 **A.** Yes.

3 **Q.** And then, P-59, do you recognize P-59?

4 **A.** Myself.

03:29:35 5 **Q.** Is that the fake ID that you had with you, that you
6 used?

7 **A.** Yes.

8 **Q.** What does it say up there? What name? The name up
9 there is XXXXXXXXXXXXXXXXXXXXXXXX, right?

03:29:50 10 **A.** Yes.

11 **Q.** That's the name you used when you tried to get your
12 T-visa?

13 **A.** Yes.

14 **Q.** That's the date of birth you used when you tried to
03:29:58 15 get your T-visa, right?

16 **A.** Yes.

17 **Q.** So you are under oath. Tell the members of the jury
18 what is your date of birth. Tell them, please, your true
19 date of birth.

03:30:10 20 **A.** The 25th of June of 1993.

21 **Q.** P-53, do you recognize the person on P-53?

22 **A.** Yes.

23 **Q.** Who is that person on P- -- what persons are depicted
24 on P-53?

03:30:42 25 **A.** The first one is me, and the other one is a girl that

1 I had to take there with me.

2 **Q.** At Las Palmas?

3 **A.** Yes.

4 **Q.** And you didn't know until very recently that Edwin had
03:30:53 5 taken that picture of you, did you?

6 **A.** Yes.

7 **Q.** You didn't even know Edwin had that picture of you?

8 **A.** Yes.

9 **Q.** How about P-54? Who is the first person depicted on
03:31:15 10 54?

11 **A.** Me.

12 **Q.** Did you know Edwin had that picture of you?

13 **A.** No.

14 **Q.** How about P-55? Who is that person in P-55?

03:31:30 15 **A.** Myself.

16 **Q.** Did you know Edwin had that picture of you?

17 **A.** No.

18 **Q.** Did he explain recently that he took these pictures at
19 the time he was trying to rescue you? Didn't he tell you
03:31:44 20 that?

21 **A.** Yes.

22 MR. PEREZ: I'll pass the witness, Your Honor.

23 **RECROSS-EXAMINATION**

24 BY MR. FAZEL:

03:32:09 25 **Q.** Very briefly. Ma'am, I'm not intimidating -- I'm not

1 suggesting -- it's been a long day. I'm not suggesting
2 that Mr. Edwin did anything or didn't do anything. What
3 I'm asking you is something very simple.

4 When I reviewed your file, your attorney, your private
5 attorney has filed documents for you to stay in the
6 country. Do you understand that?

7 **A.** Please repeat the question.

8 **Q.** Sure. Your private attorney has filed documents with
9 immigration to have you remain in the country. Do you
10 understand that?

11 **A.** Yes.

12 **Q.** Those documents that are filed post your escape, after
13 your escape, are still showing a date that's on your false
14 ID. Do you understand that?

15 **A.** No.

16 MR. FAZEL: I pass the witness, Your Honor.

17 THE COURT: Anything further?

18 MR. PEREZ: No, Your Honor.

19 THE COURT: Thank you. You may step down. You
20 are excused. You are free to leave.

21 MR. PEREZ: XXXXXXXXXXXXXXXX, Your Honor. May I
22 approach the bench, Your Honor?

23 THE COURT: Yes.

24 (Proceedings held at sidebar.)

25 MR. PEREZ: Your Honor, there is an attorney in

1 the audience who has made an appearance as the next
2 witness' attorney, private attorney.

3 THE COURT: All right.

4 MR. PEREZ: He wanted me to introduce you to him.
03:33:58 5 I said, well, you know, I don't want to do it in front of
6 the jury. I just wanted to let you know.

7 THE COURT: Who is it?

8 MR. PEREZ: Some guy named Lewis Smith, I think,
9 Judge.

03:34:07 10 THE COURT: What is his name?

11 MR. PEREZ: Smith. He just showed up.

12 MR. FAZEL: Which one is it?

13 THE COURT: Where is he?

14 MR. PEREZ: There he is.

03:34:15 15 THE COURT: I don't think he needs to come
16 forward. Well, he wants to come forward. He is coming
17 forward.

18 MR. MAGLIOLO: Everybody wants to meet a federal
19 judge.

03:34:31 20 (Counselors Craig Stanfield and Lewis Smith approached
21 bench.)

22 THE COURT: Who do we have here?

23 MR. FAZEL: Some very young people.

24 THE COURT: State your names since you walked up
03:34:41 25 here.

1 MR. STANFIELD: Your Honor, we are Craig
2 Stanfield and Lewis Smith from Morgan Lewis. We're
3 private counsel for Ms. XXXXX. We are here for her level
4 of comfort. She has asked us to be here. We filed a
5 notice this Monday.

6 THE COURT: I guess she is a little more
7 uncomfortable now that you have moved forward. What do
8 you want now? Do you want to be introduced as just a
9 couple of visiting attorneys or what? We have a couple of
0 visiting attorneys and leave it there or what?

1 MR. PEREZ: Leave it alone. I just wanted you to
2 know.

3 MR. STANFIELD: We don't want to --

4 THE COURT: I introduced a new federal judge.
5 How do you get a jump on that?

6 MR. FAZEL: I was goi

7 thought your cross and direct you should consider teaching
8 law school with that.

9 THE COURT: Are you talking about him?

0 MR. FAZEL: I am talking about cross and direct
1 when you were giving the examples.

2 THE COURT: With all due respect, I think this
3 pays somewhat more sometimes. The professor tried to get
4 me to do that before. You can't beat the retirement.

5 | Thank you.

1 MR. PEREZ: I just wanted you to know.

2 THE COURT: Thank you.

3 (Proceedings concluded at sidebar.)

4 THE COURT: I guess today is visiting day.

5 Anyhow, Counsel, will you call your next witness,
6 please.

7 MR. PEREZ: XXXXXXXXXXXXXXX, Your Honor.

8 THE COURT: How do you spell the name, please,
9 sir?

10 MR. PEREZ: I better check, Your Honor. XXXXXXX,
11 XXXXX --

12 THE COURT: XXXXX --

13 MR. PEREZ: -- XXXXXXX and the last name, LXXXX,
14 LXXXXXXXX.

15 THE INTERPRETER: I don't think it's on. I'm
16 sorry to interrupt.

17 THE COURT: You are right. I have to push that
18 button again. All right.

19 Take the oath, please. Just raise your right hand.

20 (Sworn by the case manager through the interpreter.)

21 THE COURT: You did that very well. All right.
22 Go right ahead, please.

23 MR. PEREZ: Thank you, Your Honor.

24 XXXXXXXXXXXXXXX,

25 having been first duly sworn, testified through the

1 interpreter as follows:

2 **DIRECT EXAMINATION**

3 BY MR. PEREZ:

4 **Q.** State your name for the Court and the members of the
5 jury, please, ma'am.

6 **A.** XXXXXXXXXXXXXXXXXXXX.

7 **Q.** How do you spell your last name?

8 **A.** XXXXXXXX with an S, XXXXX.

9 **Q.** How do you spell XXXXXX?

10 **A.** XXXXXXXX.

11 THE COURT: You can -- oh, now you have got it.

12 **Q.** (By Mr. Perez) Are you from Mexico, ma'am, born in
13 Mexico?

14 **A.** Yes.

15 **Q.** And I'm going to direct your attention to when you
16 were in Mexico when you were 15 years old. Did you meet a
17 fellow in Mexico who later turned out to be your padrote?

18 **A.** Yes.

19 **Q.** Where did you meet him?

20 **A.** In Mexico at a fair.

21 **Q.** Okay. And at that carnival, you met him there; and
22 did you at some point become -- at some point become his
23 girlfriend?

24 **A.** I went there with my brother. I met him there. He
25 asked me for a phone number. I gave it to him and started

1 talking and started going out. I became his girlfriend
2 later. I was going through a different situation with my
3 family.

4 **Q.** What happened with -- again, I'm sorry to ask these
5 questions. But what was -- what situation were you going
6 through with your family?

7 **A.** The economy had really decreased or fallen at my house
8 because my father had been hit by bullets.

9 **Q.** How many sisters and brothers do you have?

10 **A.** We are eight. I have four brothers and three sisters
11 and myself.

12 **Q.** You were never a prostitute in Mexico, right?

13 **A.** No. I was a student.

14 **Q.** How long after you met your boyfriend did you and he
15 come to the United States?

16 **A.** About eight months.

17 **Q.** And did you -- who made those arrangements for you to
18 come to the United States?

19 **A.** Javier.

20 **Q.** Again, up until that point you were not a prostitute,
21 right?

22 **A.** Yes.

23 **Q.** I'm sorry. Bad question on my part. You were not a
24 prostitute?

25 THE COURT: Correct?

1 THE WITNESS: No. It's correct.

2 **Q.** (By Mr. Perez) And he did not ask you to be a
3 prostitute; is that correct?

4 **A.** No. Oh, sorry.

5 **Q.** Let me ask it this way. Okay. During the time you
6 were in Mexico isn't it true that he never asked you to be
7 a prostitute or did he?

8 **A.** No. He never asked me to be a prostitute.

9 **Q.** And at some point you and he or he decides that you
10 are coming to the United States?

11 **A.** I didn't understand.

12 **Q.** Did you -- did he make arrangements for you and him to
13 come to the United States?

14 **A.** He was already here. I came afterwards.

15 **Q.** So he was here, and he made arrangements for you to
16 come be with him in the United States?

17 **A.** Yes.

18 **Q.** Did you try to enter the United States?

19 **A.** Yes. In January of 2012.

20 **Q.** And at that time were you successful in coming to the
21 United States?

22 **A.** No.

23 **Q.** What happened?

24 **A.** When I entered the country I was detained in McAllen,
25 and they returned me to Mexico.

1 **Q.** Did any -- was money being paid to a coyote to get you
2 to the United States?

3 **A.** Yes.

4 **Q.** Who was paying that money?

5 **A.** Javier.

6 **Q.** And they returned you to Mexico. Did you again try to
7 get in the United States?

8 **A.** Yes. Eight days after I had been returned to Mexico I
9 came back.

10 **Q.** And were you able -- did you succeed the second time
11 in coming to the United States?

12 **A.** No, not either. I waited another 15 days to try
13 again.

14 **Q.** So you tried a third time to enter the United States?

15 **A.** Yes.

16 **Q.** Were you successful the third time?

17 **A.** Yes. I arrived in Houston February 14th.

18 **Q.** Of 2012?

19 **A.** Yes.

20 **Q.** How much is the debt to the coyote at this point, if
21 you know?

22 **A.** Approximately \$10,000.

23 **Q.** And who was supposed to pay that money to the coyote?

24 **A.** Javier.

25 **Q.** You get to Houston, I think you said, February 2012.

1 Again, up until that point you had not worked as a
2 prostitute; is that correct?

3 **A.** Correct.

4 **Q.** At some point did he ask you to become a prostitute
5 for him?

6 **A.** Yes.

7 **Q.** Tell the members of the jury the circumstances under
8 which he asked you to be a prostitute for him.

9 **A.** About eight days after I arrived, a friend went to
10 visit him at our house. He said I was young, I had a good
11 body; and I could make a lot of money. And he said they
12 would talk about it later, changed the topic; and the
13 friend left.

14 And that night I asked him why is it that his friend
15 had said that. He said I should forget about it and not
16 pay any attention to it.

17 I saw him in a bad mood later, angry, tired. I asked
18 him what was wrong. He said he was under a lot of stress
19 because he owed a lot of money because of me. He needed
20 to pay.

21 I told him I wanted to help him, that he should look
22 for a job for me; and he asked me if I was ready to work
23 at whatever he asked me to do. I said, "Yes."

24 And he said the wife of his friend worked as a
25 prostitute and that she made between \$3,000 and \$4,000 a

1 week and I told him I would think about it.

2 **Q.** Now, did you really want to be a prostitute at that
3 time when he asked you?

4 **A.** No, but I was in love with him. And I didn't want to
5 see him -- I didn't like to see him angry and stressed
6 out.

7 **Q.** So you thought about it. And what did you come to the
8 decision to do?

9 **A.** I told him I would think about it. A week went by.
10 Then I accepted. He said his friend's wife would take me
11 to a bar. I told him it was okay.

12 And I asked him to explain to me how it would work
13 out, what it was like. He said all of them charged \$75
14 and \$15 to pay to enter the room. And dependent whether
15 it was from the waist down, different positions, I could
16 charge more.

17 **Q.** And this was where? Where were you going to work?

18 **A.** At Las Palmas.

19 **Q.** Did you, in fact, go with this lady to Las Palmas?

20 **A.** Yes. She was there, and they took me there later.

21 **Q.** Okay. And did you talk to somebody at Las Palmas to
22 get you a job?

23 **A.** Yes, with a guy that was by the rooms.

24 **Q.** Do you know his name?

25 **A.** He told me his name was Eric, but I don't know if that

1 was true.

2 **Q.** What did Eric tell you about you working there at Las
3 Palmas?

4 **A.** I told him that I had been sent there by a young woman
5 called or whom they called La Guera. He said he would
6 call her and he did and then came and asked me how old I
7 was and whether I had an ID. I told him yes, and I showed
8 it to him.

9 He said I could stay, but he said in the afternoon
10 someone else would arrive and would see me to decide
11 whether I could stay to work or whether I had to leave.

12 **Q.** Did you stay?

13 **A.** Yes.

14 **Q.** And nobody told you you couldn't stay. So you stayed
15 there and continued to work?

16 **A.** I didn't see the person who was going to decide
17 whether I could stay or not.

18 **Q.** How long did you work there as a prostitute at Las
19 Palmas?

20 **A.** I started working on March the 5th until the month of
21 August.

22 **Q.** And that would be March and August of 2012, right?

23 **A.** Yes.

24 **Q.** When were you -- what were your hours there at Las
25 Palmas?

1 **A.** 4:00 in the afternoon till 3:00 a.m. in the week; and
2 on the weekend, 4:30 a.m.

3 **Q.** On a typical Saturday night, can you tell the members
4 of the jury how many girls worked there as prostitutes?

5 **A.** Between 30 and 32.

6 **Q.** And what were the -- how much were you supposed to
7 give to Las Palmas for each sex act?

8 **A.** \$15.

9 **Q.** And then whatever you wanted to charge the customer
10 was up to you?

11 **A.** Yes.

12 **Q.** And who would you give the money to that you made
13 there working as a prostitute?

14 **A.** Javier.

15 **Q.** Were you still in love with him at that time?

16 **A.** Yes.

17 **Q.** Approximately how much money would you make on a
18 typical Saturday night from working sex acts there at Las
19 Palmas?

20 **A.** Between \$800 and \$900.

21 **Q.** Did at some point a person by the name of Lupe ask you
22 about your age?

23 **A.** Yes. I was seated at a table. She was just arriving.
24 She said I looked too young. I told her I was 21; and if
25 she wanted to, I could show her my ID.

1 She said, no, there is no problem; and she kept on
2 going.

3 **Q.** On Government Exhibit Number B there is a woman named
4 Guadalupe Valdez-Lugo. Is that the person that asked you
5 about your age?

6 **A.** Yes.

7 **Q.** I'm going to show you something marked as Government
8 Exhibit 32a. Is that your birth certificate?

9 **A.** Yes.

10 **Q.** And what is the date of birth on that birth
11 certificate?

12 **A.** June 22nd, 1996.

13 MR. PEREZ: I think it's already in evidence or
14 I'm offering it in evidence, Your Honor.

15 THE COURT: No. Just keep going. If we hear any
16 objection, we'll hear it.

17 MR. FAZEL: Can I see it? Do you want to put it
18 in evidence?

19 THE COURT: Remember, everything is in unless I
20 hear an objection.

21 MR. FAZEL: I have the same objection that we did
22 at the bar conference. I just want to lodge it.

23 THE COURT: So noted. So noted. The same ruling
24 applies.

25 **Q.** (By Mr. Perez) What happened -- P-36, can you

1 identify the person on P-36?

2 **A.** Yes. He is the guy to whom I showed my ID to see
3 whether I would stay there to work or not. He is the one
4 that was up by the rooms. He is the one that opened the
5 door and then received the \$15 that I gave him so that I
6 would get the condoms.

7 **Q.** How about P-1? Do you recognize that location on P-1?

8 **A.** Yes. It's the way we entered and left.

9 **Q.** Is that Las Palmas where you worked?

10 **A.** Yes.

11 **Q.** I think you mentioned that you worked in Las Palmas
12 from March to August of 2012?

13 **A.** Yes.

14 **Q.** In August of 2012, what happened that you no longer
15 worked for Las Palmas?

16 **A.** Javier had left for Mexico in May. So I started
17 talking to the girls that worked there. One of them
18 approached me. We were chatting. She asked me just
19 regular things, where I came from, whether I was married.

20 I said, "Yes."

21 So I showed her a picture of my husband, Javier. She
22 said he was La Guera's husband.

23 I said, "No. He is my husband."

24 And she said she could ask him so that I could hear.

25 I said, "Sure. Okay."

1 She called him. I listened. And then, I found out
2 that Javier had more than one woman working for him.

3 I felt disappointed, used; and that's when I took the
4 decision to leave him.

5 That same girl put me in contact with another person
6 in Chicago. And then, I left Las Palmas; and I left
7 Javier.

8 **Q.** So you found out that not only was he a pimp for you,
9 but that he was a pimp for other women?

10 **A.** Yes.

11 **Q.** So did you, in fact, go to Chicago; or where did you
12 go?

13 **A.** In the month of August is when I left Las Palmas, and
14 I went to Chicago in September.

15 **Q.** During the time that you worked there at Las Palmas,
16 did you have contact with Tencha?

17 **A.** I just saw her.

18 **Q.** What would she do when you would see her?

19 **A.** She was in a small hut, cabin where you go through to
20 enter Las Palmas.

21 **Q.** And what would she do there?

22 **A.** Nothing. I would just see her there occasionally.

23 **Q.** Did you ever talk to her?

24 **A.** No. Because during the time I was with Javier, he
25 wouldn't let me talk to anyone.

1 **Q.** But you would see her there at the location?

2 **A.** Yes.

3 **Q.** Were there any guards there?

4 **A.** (Speaking Spanish.)

5 **Q.** Were there any guards, security guards?

6 **A.** There were several. I don't know who they were. I
7 know they were there in the parking lot watching the cars.

8 **Q.** Were there any other workers there at Las Palmas
9 besides Eric?

10 **A.** Yes.

11 **Q.** And did these workers work for Tencha?

12 **A.** I think so.

13 **Q.** Now, you were an illegal alien when you worked there
14 at Las Palmas, right?

15 **A.** What did you say?

16 **Q.** You were there illegally in Las Palmas, right? You
17 are from Mexico?

18 **A.** Yes.

19 **Q.** Were other people there -- as far as, if you know, the
20 other people who were prostituting themselves there at Las
21 Palmas, were they illegal?

22 **A.** All the women that worked there were undocumented.

23 **Q.** You mentioned that this Lupe woman asked you about
24 your age. Did she work there, as well?

25 **A.** Yes. She arrived at night. She was like a bartender.

1 She sold water, beer.

2 **Q.** Now, you said that you went off to Chicago, right?

3 **A.** Yes.

4 **Q.** What did you do in Chicago when you worked?

5 **A.** I also worked as a prostitute in Chicago.

6 **Q.** Who was your pimp in Chicago?

7 **A.** I didn't have a pimp. It was the owner of the place.

8 But the charge was \$40. \$20 for him and \$20 for me.

9 **Q.** Let me ask you this: You worked in Chicago as a
10 prostitute, right?

11 **A.** Yes.

12 **Q.** Why did you work in Chicago as a prostitute, and why
13 didn't you get a job not working as a prostitute?

14 **A.** Because I didn't know anything else I could do. In
15 Mexico I did not have a job. I was a student. And I had
16 no family. I didn't have any other profession. I was
17 really depressed when I had found out about Javier. And
18 that was the fastest solution. I had a house, and I just
19 went to work.

20 **Q.** How long did you work as a prostitute in Chicago?

21 **A.** From September to March.

22 **Q.** What happened after March?

23 **A.** I returned to Houston.

24 **Q.** And what did you do when you arrived here in Houston?

25 **A.** I worked as a prostitute, too.

1 **Q.** Okay. Did you have a pimp when you came back to work
2 in Houston as a prostitute?

3 **A.** No.

4 **Q.** At some point did the FBI or law enforcement make
5 contact with you?

6 **A.** Yes, in May.

7 **Q.** May of what year?

8 **A.** Of 2013.

9 **Q.** Tell the members of the jury under -- the
10 circumstances under which you met law enforcement.

11 **A.** I was just finishing work. I was arriving home.

12 **Q.** About what time?

13 **A.** Approximately at midnight.

14 **Q.** Where were you living?

15 **A.** In the south of Houston at apartments called Willow
16 Creek.

17 **Q.** What happened there?

18 **A.** I was dropped on the street. So I had to cross it to
19 get to my apartment, and they were in the parking lot.

20 **Q.** Who was in the parking lot?

21 **A.** The FBI agents; but I didn't notice them because there
22 were no police, no patrols. They were dressed normally
23 like everybody else.

24 I was listening to music. I didn't realize they were
25 following me until I opened the door of my apartment.

1 And when I was going to take the keys out of my purse,
2 they asked me if I had a weapon or anything like that.

3 **Q.** How old were you at this time, ma'am?

4 **A.** 16.

5 **Q.** I'm sorry. Go ahead.

6 **A.** They asked me if somebody was home. I said, "No."
7 They said they wanted to talk with me; and I said, "No."

8 **Q.** You told them you did not want to talk to them?

9 **A.** No. That there was no one at home.

10 **Q.** You agreed to talk to them?

11 **A.** Yes. And they asked me if they could come in; and I
12 said, "Yes."

13 I was carrying some bags with fruit in them, and they
14 helped me put them inside.

15 And they asked me how old I was, what my name was. I
16 was afraid. I didn't want to tell them my age.

17 **Q.** Why didn't you want to tell them your age?

18 **A.** For fear they would lock me up and then deport me to
19 Mexico.

20 **Q.** Okay. Go ahead.

21 **A.** They talked to me. They checked the apartment.

22 **Q.** Were you being honest with them at that time? Were
23 you telling them the truth?

24 **A.** No.

25 **Q.** What were you telling them that was not the truth?

1 **A.** They said they had saved or rescued many girls that
2 were in my situation. I told them I didn't know what they
3 were talking about since I was working as a caretaker of
4 children.

5 MR. FAZEL: Your Honor -- I'm sorry, ma'am. If
6 it could be Q&A because I can't object. It's narrative.

7 THE COURT: All right. Go on.

8 MR. PEREZ: I will.

9 **Q.** (By Mr. Perez) So what else did you tell them?

10 **A.** That I was of age; and I showed them a fake ID, which
11 is the one I had used when I began to work at Las Palmas.

12 **Q.** What, if anything, further did you tell them?

13 **A.** He asked me if I was married. I said, no, that they
14 could look; and they would not find a man, nothing
15 belonging to a man. All the things that were there were
16 mine. I lived alone.

17 They said I shouldn't be afraid. They were not going
18 to harm me. On the contrary, they would help me.

19 They asked me for my cell phone. I gave it to them.
20 They copied everything I had on my cell phone.

21 They said I had to go with them. I changed my
22 clothes. They said I should take one or two changes of
23 clothing.

24 They found one of my purses with \$2,300.

25 **Q.** And where had you got those \$2,300 from?

1 **A.** From prostitution. In the purse that I was carrying
2 they found about \$800. They asked me why I was carrying
3 so much money in my purse.

4 **Q.** What did you tell them?

5 **A.** I asked them if it was a crime to carry so much money.

6 **Q.** What did they tell you?

7 **A.** They said, no; but that it was strange that a
8 babysitter should carry so much money in her purse. And I
9 told them it was a whole month's. They asked me to count
10 all the money that I had and that I should go with them.

11 I asked if I could take my cell phone. They said, no,
12 that they would later get in touch with my family.

13 I went to Shiloh. They took me to Shiloh -- it's a
14 psychiatric center -- to see a psychiatrist and a
15 psychologist to see whether I was psychologically
16 affected. They took me there. I was there for a while.

17 About eight days later the agents who had taken me
18 there came. I spoke with them. But the first time I
19 didn't tell them the truth.

20 **Q.** Why didn't you tell them the truth at that time?

21 **A.** Because it had been a long time since I had been in
22 touch with my family. Because I was really covering up
23 for people who didn't care about me, that they were just
24 using me, that I had to have sex with men and they would
25 receive the money.

1 At that time that I didn't tell the truth to them,
2 they didn't let me talk to my family until the second time
3 they came; and they let me talk to my mother. The
4 speakerphone was on. My mother said I should tell the
5 truth, that she had started an action, a legal action
6 against Javier in Mexico. And since I was crying there,
7 they asked me if I wanted to talk about that right then or
8 make an appointment for later.

9 **Q.** So what happened?

10 **A.** I told them I didn't want to stay locked up. I wanted
11 to talk about this with them.

12 **Q.** Did you, in fact, tell them the truth at that time?

13 **A.** Yes.

14 **Q.** What did you tell them? Did you tell them the truth?

15 **A.** Yes. I told them how it came about that I came, that
16 Javier brought me, with whom I had been working, that I
17 had been working at Las Palmas.

18 **Q.** Did you later find out that, in fact, your mother had
19 been asking authorities in Mexico for you, that they in
20 turn contacted the Mexican consulate and the Mexican
21 consulate then contacted the FBI? Did you know that?

22 **A.** No. I found out later.

23 **Q.** You later found out that that's what had happened,
24 right?

25 **A.** Yes. Yes. Because since I had lied to them at the

1 beginning, they didn't know whether I was telling the
2 truth then or was still lying.

3 And later my mother sent my birth certificate, my
4 military insurance; and then, they found out that my
5 mother had been looking for me at the Mexican consulate.

6 **Q.** Well, are you happy now that they rescued you?

7 **A.** Yes.

8 **Q.** Do you know the fellow behind me, Edwin?

9 **A.** Yes. He has helped me in many things.

10 **Q.** Do you know the name of the officer who rescued you
11 there at the apartment?

12 **A.** Yes. Joel Hernandez.

13 **Q.** Joel Hernandez?

14 **A.** Yes. Then I met the agent called Edwin.

15 **Q.** The fellow sitting behind me?

16 **A.** Yes.

17 **Q.** And have you told Edwin the truth?

18 **A.** Yes.

19 **Q.** Have you told the members of the jury the truth here
20 today?

21 **A.** Yes.

22 **Q.** How is your life now compared to the life that you
23 lead there when you worked at Las Palmas?

24 MR. FAZEL: Judge, I'm going to object to
25 relevance.

1 THE COURT: Overruled. I understand. Overruled.

2 Q. (By Mr. Perez) You can answer the question, ma'am.

3 **A.** It's different. I value my body more. I have become
4 a part of society again. I am young. I am 18.

5 THE COURT: How old? Excuse me. How old are you
6 now?

7 THE WITNESS: 18.

8 THE COURT: Okay.

9 **A.** I am -- have continued studying. It's not easy. I
10 know I'm on a better road than the one I was on before.

11 Q. (By Mr. Perez) Now, my last question: I asked you if
12 Lupe had asked about your age when you worked at Las
13 Palmas, right? You lied to Lupe about your age?

14 A. Yes.

15 Q. Was Tencha in a position to see you, as well?

16 A. Okay.

17 Q. If Tencha had asked you the same question would you
18 have told her the same answer?

19 | A. Yes.

20 MR. PEREZ: I'll pass the witness, Your Honor.

21 THE COURT: All right. How much time do you
22 have? Do you have some time with this witness?

23 MR. FAZEL: A little bit.

24 THE COURT: Well, you tell me. What -- the jury,
25 do you want to take a break now? I know we got back in --

1 anybody? You want to take a short break or keep going?

2 JUROR: (Raised hand.)

3 THE COURT: Yes, you want to take a break. All
4 right. I have one affirmative. All right. Take a look
5 now. I've got 4:17. Let's get back in at 4:30. We'll
6 see you then.

7 THE MARSHAL: All rise for the jury.

8 (Jury exited courtroom at 4:17 p.m.)

9 (Recess from 4:17 p.m. to 4:35 p.m.)

10 THE COURT: Let's call them in.

11 THE MARSHAL: All rise for the jury.

12 (Jury entered courtroom at 4:35 p.m.)

13 THE COURT: Thank you. Be seated. Go right
14 ahead.

15 MR. FAZEL: Thank you, Your Honor.

16 **CROSS-EXAMINATION**

17 BY MR. FAZEL:

18 Q. Good afternoon, ma'am. My name is Ali Fazel. You and
19 I have never met before, correct?

20 A. No.

21 Q. I have a few questions for you. If you don't
22 understand or need me to repeat myself, let me know; and I
23 will. Okay?

24 A. Okay.

25 Q. When you arrived in Houston, Texas, you went to a

1 location that was set up for you for your pimp, correct --
2 by your pimp, correct?

3 **A.** Yes.

4 **Q.** And at the time you had assumed that you were married
5 to him?

6 **A.** Yes.

7 **Q.** And I understand it's not a formal marriage; but you
8 had that belief in your system that you two were, for all
9 intents and purposes, married to each other?

10 **A.** Yes.

11 **Q.** And he asked you to engage in prostitution to make
12 money?

13 **A.** Yes.

14 **Q.** And to pay back the debt?

15 **A.** Yes.

16 **Q.** And you agreed to do that?

17 **A.** Yes.

18 **Q.** And when you agreed to do that, he asked you to go
19 with somebody else to a bar?

20 **A.** Yes.

21 **Q.** If he had asked you to go to any bar, you would have
22 done -- you would have gone to any bar, correct?

23 **A.** Yes.

24 **Q.** He asked you to go to a specific bar, and you did so?

25 **A.** Yes, because one of his women was working there.

1 **Q.** But at the time you didn't know that or did you?

2 **A.** No.

3 **Q.** Okay. And so you went to the bar, and you had a fake
4 ID with you?

5 **A.** Yes.

6 **Q.** And this fake ID was obtained by your pimp?

7 **A.** Yes.

8 **Q.** And you used that fake ID to start working at Las
9 Palmas?

10 **A.** Yes, at Las Palmas.

11 **Q.** And if my math is correct, it was about five months
12 that you worked at Las Palmas, correct?

13 **A.** Yes.

14 **Q.** During that five-month period you went to work in
15 accordance to what you or your pimp wanted you to do? In
16 other words, you went whenever your pimp wanted you to go,
17 correct?

18 **A.** What did you say?

19 **Q.** You are right. That's a bad question. The schedule
20 you had was pursuant to whatever you and your pimp
21 decided, correct?

22 **A.** No. No. It was a schedule that the bar had. Because
23 if you arrived late you would be charged \$40, \$70. It
24 depends.

25 **Q.** Correct. I guess my question is: If you didn't want

1 to go on a Monday, nobody at that bar forced you to go on
2 Monday?

3 **A.** What did you say?

4 **Q.** If you didn't want to go in on a Monday, nobody would
5 force you from the bar to go in on a Monday?

6 **A.** No. But I would have to pay for the day I didn't go.

7 **Q.** You would have to pay Las Palmas the day you didn't
8 come over there?

9 **A.** Yes.

10 **Q.** Once you are at Las Palmas, the money that you earned,
11 the money that you agreed to with the gentleman for the
12 prostitution, that was something between you and the
13 gentleman, correct?

14 **A.** Yes.

15 **Q.** You would pay Las Palmas \$15; and the base, the rest
16 of it, was yours?

17 **A.** Yes.

18 **Q.** Okay. Now, how did you get to Las Palmas?

19 **A.** By taxi.

20 **Q.** And whose idea was that?

21 **A.** At Las Palmas they told me they had nobody who could
22 come and get me; and so, I should get a taxi. And they
23 gave me a number for a taxi that would pick me up and take
24 me back. All the girls arrived by taxi and left by taxi.

25 **Q.** Did your pimp not arrange for you to have a ride?

1 **A.** What did you say?

2 **Q.** Your pimp didn't arrange for you to have a ride?

3 **A.** No. The woman that introduced me there, the one that
4 worked for him also, gave me the number of the taxi that
5 would take me and pick me up.

6 **Q.** Would it be fair to say that a lot of the information
7 you have about Las Palmas came from this other woman?

8 **A.** Yes.

9 **Q.** So the idea that you perhaps had to pay if you didn't
10 show up on a Monday was something she told you?

11 **A.** No. One time I was late an hour, and they charged me
12 \$40.

13 **Q.** No. I understand that. But the fact that you think
14 that if you didn't show up on a Monday you would have to
15 pay for that, that's something she told you?

16 **A.** No. The day that I arrived late and they charged me
17 \$40, they told me that if I didn't show up then I would
18 have to pay more.

19 MR. FAZEL: I'm sorry. For the translator did
20 she say "show up" or a "complete day"?

21 **Q.** (By Mr. Fazel) Would you repeat your statement again,
22 please, ma'am?

23 **A.** The day that I arrived late and I had to pay \$40, they
24 told me that if on another day I didn't come I would have
25 to pay for the whole day.

1 **Q.** All right. Now, once you found out -- at some point
2 in time you said that your pimp left to go to Mexico,
3 correct?

4 **A.** Yes.

5 **Q.** And at that point in time, you were by yourself,
6 correct?

7 **A.** Yes.

8 **Q.** And you were continuing to engage in prostitution
9 because you believed that he was your husband and that you
10 felt like this was the way to help him?

11 **A.** Yes.

12 **Q.** At that point in time you were doing it voluntarily,
13 would you agree with that?

14 **A.** Yes.

15 **Q.** And at some point you determined or you found out that
16 he actually has more than one girlfriends or wives,
17 correct?

18 **A.** Yes.

19 **Q.** And that upset you?

20 **A.** Yes.

21 **Q.** You decided I'm going to stop?

22 **A.** Yes.

23 **Q.** And then you quit going to Las Palmas?

24 **A.** Yes.

25 **Q.** Did anybody from Las Palmas come chasing after you?

1 **A.** No.

2 **Q.** Did anybody at Las Palmas tell you now you owe us
3 hundreds of thousands of dollars because you are not
4 showing up?

5 **A.** No.

6 **Q.** So one day you show up, the next day you don't. Fair?

7 **A.** Yes. But if I worked there and then one day I didn't
8 show up, I would have to pay for the complete day; but if
9 I stopped working there and didn't go for an entire week
10 and then I decided to go back, they wouldn't accept me.

11 **Q.** Fair enough. The point being is that you made
12 arrangements for whatever you did at Las Palmas but that
13 arrangement was between you and Las Palmas and nobody
14 forced you from Las Palmas to do any of that; is that
15 fair?

16 **A.** Yes.

17 **Q.** You decided to go to Chicago. Do you remember
18 testifying about that?

19 **A.** Yes.

20 **Q.** You went to Chicago; and then, you continued to engage
21 in prostitution?

22 **A.** Yes.

23 **Q.** How did you find a location in Chicago for
24 prostitution?

25 **A.** The same woman that had told me that Javier had other

1 women is the one who gave me the number in Chicago.

2 **Q.** And that woman was a woman who was just like yourself,
3 engaging in prostitution in Las Palmas?

4 **A.** Yes.

5 **Q.** And was not working for Las Palmas? Was just like
6 you?

7 **A.** What did you say?

8 **Q.** She wasn't an employee at Las Palmas? She was just
9 like you, somebody who was there engaging in prostitution?

10 **A.** Yes.

11 **Q.** Then you said you came back from Chicago?

12 **A.** Yes.

13 **Q.** And when you came back, you came back to Houston?

14 **A.** Yes.

15 **Q.** And then you continued to do -- to engage in
16 prostitution?

17 **A.** Yes.

18 **Q.** Where did you engage in prostitution? What cantinas?

19 **A.** It was no longer in bars. It was in apartments.

20 **Q.** Was it in apartments that you set up for yourself?

21 **A.** No. With -- no, with other women who were owners of
22 the apartments.

23 **Q.** How did you meet these women?

24 **A.** The man for whom I was working or with whom I was
25 working in Chicago knew them, and he gave me the numbers

1 so that I could get in touch with them.

2 **Q.** So the gentleman in Chicago allowed you to leave and
3 come back to Houston because you wanted to come back to
4 Houston?

5 **A.** I wanted to return to Houston.

6 **Q.** So again, you weren't forced into doing what you were
7 doing in Chicago either?

8 **A.** No.

9 **Q.** And then, when you came back to Houston with these --
10 and I'm going to call them what you called them -- madams,
11 you were not forced? You were volunteering to engage in
12 that activity with them, as well?

13 **A.** Yes. Because I had a different mentality. I didn't
14 value myself as a woman. I thought that the only thing I
15 could do was that.

16 **Q.** I understand. You also indicated that you were
17 staying at an apartment complex, and I think you said the
18 apartment complex was Willow Creek; is that right?

19 **A.** Yes.

20 **Q.** Is there a reason that -- did you know that there were
21 other pimps in that same apartment complex?

22 **A.** No.

23 **Q.** Were there other girls that engaged in prostitution
24 that lived in that apartment complex?

25 **A.** I don't know.

1 **Q.** When you were with your pimp, is that where you were
2 staying at?

3 **A.** No. I lived about ten minutes away from there.

4 **Q.** From Willow Creek?

5 **A.** Yes.

6 **Q.** Okay. When you came back, did your pimp know you were
7 back?

8 **A.** No. Since I left him, I have not been in touch with
9 him to date.

10 **Q.** At some point in time you said the FBI agents came and
11 started talking to you. Do you remember that?

12 **A.** Yes.

13 **Q.** And they entered your home?

14 **A.** Yes.

15 **Q.** Did they ask permission, or did they just kind of come
16 in?

17 **A.** No. They asked for permission, and they asked me for
18 things gently.

19 **Q.** And they came in and started talking to you. At some
20 point in time they say, hey, you have got to get out of
21 here? We're taking you?

22 **A.** Yes, when they understood that I was underage and they
23 couldn't leave me alone there.

24 **Q.** How old were you?

25 **A.** 16.

1 **Q.** Okay. And so, they took you to a psychiatric center?

2 **A.** Yes. They wanted to know if I was traumatized
3 psychologically because of what was happening, emotional.

4 **Q.** And did you -- did you want to go voluntarily, or did
5 they say you have got to go?

6 **A.** I went voluntarily.

7 **Q.** Okay. Even though you weren't telling the truth, you
8 decided to go there voluntarily?

9 **A.** Yes.

10 **Q.** You are currently living in the United States?

11 **A.** Yes.

12 **Q.** And are you obtaining your citizenship or obtaining
13 your papers to become legal here?

14 **A.** Yes.

15 **Q.** And as part of that, you are getting the assistance of
16 the government in order to do that?

17 **A.** What did you say?

18 **Q.** As part of that attempt to become a legal citizen in
19 this country, you are getting the help of the government
20 to do that, correct?

21 **A.** Yes.

22 MR. FAZEL: Your Honor, may I have just one
23 moment?

24 THE COURT: Yes.

25 **Q.** (By Mr. Fazel) One question, ma'am. Throughout the

1 what happened to you and talking to the government, did
2 they ever file any criminal charges against you for any
3 reason?

4 **A.** No.

5 MR. FAZEL: I pass the witness.

6 **REDIRECT EXAMINATION**

7 BY MR. PEREZ:

8 **Q.** Ms. Lucas, all the minors working there as prostitutes
9 at Las Palmas who had pimps were supplied fake ID's,
10 right?

11 MR. FAZEL: Objection to the form of the question
12 as to "all minors."

13 THE COURT: Overruled. If she knows. Let's add
14 that "if she knows."

15 MR. PEREZ: If you know.

16 THE COURT: Do you want the question again? Ask
17 it again.

18 **Q.** (By Mr. Perez) I will. Okay. Isn't it true that all
19 the minors working as prostitutes with pimps at Las Palmas
20 were supplied with fake ID's, if you know?

21 **A.** I don't know.

22 **Q.** Okay. You yourself have a fake ID, right?

23 **A.** Yes.

24 **Q.** And then, I also think that you mentioned that Lupe,
25 the woman you identified on Government Exhibit Number B,

1 asked you about your age, that you appeared to be a minor,
2 right? Do you remember that?

3 **A.** Yes.

4 **Q.** And the same opportunity that Lupe had to observe you
5 is the same opportunity that Tencha had to observe you as
6 being -- looking very young there at Las Palmas; is that
7 right?

8 MR. FAZEL: Objection, asked and answered, Your
9 Honor.

10 THE COURT: Overruled. But correct?

11 THE WITNESS: What did you say?

12 **Q.** (By Mr. Perez) Let me repeat that. Are you having
13 problems hearing from over there?

14 **A.** (Speaking Spanish.)

15 THE COURT: Can't understand your question.

16 MR. PEREZ: I understand. Okay. I told her to
17 be honest. She is being honest, Your Honor.

18 **Q.** (By Mr. Perez) All right. You said that Lupe had an
19 opportunity to observe you, and she asked if you were a
20 minor?

21 **A.** Yes.

22 **Q.** The same opportunity that Lupe had to observe you was
23 the same opportunity that Tencha had to observe you,
24 right?

25 **A.** Yes.

1 MR. PEREZ: I have no further questions, Your
2 Honor.

3 THE COURT: Anything further?

4 MR. FAZEL: No, Your Honor.

5 THE COURT: Thank you. You may step down. You
6 are excused. You are free to leave.

7 Okay. Call your next witness.

8 MR. PEREZ: XXXXXXXXXXXX, Your Honor.

9 THE COURT: Again, name, please, while we are
10 waiting.

11 MR. PEREZ: First name XXXXXXXXXXXX.

12 THE COURT: XXXXXXXX?

13 MR. PEREZ: XXXXXXXX, yes, Your Honor.

14 THE COURT: Last name, please.

15 MR. PEREZ: Last name XXXXXXXXXXXX.

16 THE COURT: XXXXXXXXXXXX?

17 MR. PEREZ: XXXXXXXXXXXX, yes, Your Honor.

18 (Witness sworn by the case manager through the
19 interpreter.)

20 THE COURT: By the way, if I forget before you
21 head out the door, if I misstated, it's 9:00 tomorrow,
22 9:00 a.m. tomorrow. There will probably be more traffic,
23 but you are still after some of the rush. Go right ahead.

24 MR. PEREZ: Thank you, Your Honor.

25 XXXXXXXXXXXX,

1 having been first duly sworn, testified through the
2 interpreter as follows:

3 **DIRECT EXAMINATION**

4 BY MR. PEREZ:

04:55:21 5 Q. State your name for the Court and the members of the
6 jury, please, ma'am.

7 A. XXXXXXXXXXXXXXXX.

8 Q. Were you born in Mexico, ma'am?

9 A. Yes.

04:55:32 10 Q. And how old are you?

11 A. 25.

12 Q. Did you meet a person who you later came to know as a
13 pimp in Mexico in Mexico?

14 A. Could you repeat the question?

04:55:55 15 Q. Did you meet somebody in Mexico when you were very
16 young who later came out to be your boyfriend?

17 A. Yes.

18 Q. How old were you when you met this fellow?

19 A. 15.

04:56:08 20 Q. What was his name?

21 A. Gerardo Salazar.

22 Q. What was his nickname?

23 A. El Gallo.

24 Q. And how old were you, again, when you met him?

04:56:22 25 THE COURT: What does that mean? It's a

1 nickname.

2 MR. PEREZ: The Rooster, Your Honor.

3 THE COURT: The Rooster?

4 MR. PEREZ: Yes, Your Honor.

04:56:28 5 THE COURT: Okay. Go on.

6 MR. PEREZ: Thank you, Your Honor.

7 **Q.** (By Mr. Perez) How old were you when you met The
8 Rooster?

9 **A.** 15.

04:56:37 10 **Q.** Where did you meet him in Mexico?

11 **A.** In Mexico City.

12 **Q.** Did you and The Rooster eventually come to the United
13 States?

14 **A.** We didn't arrive together. He sent for me.

04:57:04 15 **Q.** Okay. How long after you met him did he ask for you
16 to come to the United States?

17 **A.** A short time. A week or two.

18 **Q.** Do you come from a poor family background in Mexico,
19 ma'am?

04:57:26 20 **A.** Yes, that's true.

21 **Q.** How many brothers and sisters do you have?

22 **A.** I have one sister and two brothers.

23 **Q.** You have a father and mother?

24 **A.** Yes.

04:57:43 25 **Q.** And you met El Gallo or Gerardo Salazar in Mexico; and

1 then, within a few days he asked for you to come to the
2 United States with him?

3 **A.** Yes.

4 **Q.** And he came first; and then, you joined him; is that
04:58:02 5 right?

6 **A.** Yes.

7 **Q.** Did you prostitute for El Gallo in Mexico?

8 **A.** No.

9 **Q.** It wasn't until you came to the United States that you
04:58:14 10 prostituted for him?

11 **A.** Yes.

12 **Q.** And how did you get from Mexico to the United States?

13 **A.** Illegally.

14 **Q.** You came here with the aid of a coyote?

04:58:34 15 **A.** Yes, that's correct.

16 **Q.** Who paid for the coyote to get you to the United
17 States?

18 **A.** Gerardo Salazar.

19 **Q.** And when you arrived in Houston, did you at some point
04:58:55 20 go work as a prostitute at a beer joint?

21 **A.** Could you repeat the question?

22 **Q.** Yes. When you arrived in Houston, did you go work as
23 a prostitute at a prostitution house?

24 THE INTERPRETER: If I may, the battery is very
04:59:18 25 low, Your Honor. I need to change the battery. I'm

1 sorry, Your Honor. It's been mistreated. Got it. Thank
2 you so much.

3 **Q.** (By Mr. Perez) Okay. You said that Gerardo Salazar
4 was in the United States and he asked for you and you came
5 to join him here in the United States, right?

6 **A.** Yes.

7 **Q.** And once you arrived to the United States, you joined
8 up with El Gallo. Did he trick you into believing that
9 something had happened to him?

10 **A.** Yes, that's correct.

11 **Q.** Tell the members of the jury what the rouse was or
12 what the -- what the rouse was.

13 **A.** Telling me that immigration had got ahold of him and
14 that I had to work to make money and help him; and I told
15 him, yes, it was okay. I would work.

16 **Q.** Well, what did you think you were going to work as at
17 the time that he told you this?

18 **A.** At a restaurant.

19 **Q.** Okay. Did he contact you by telephone, or was this in
20 person when he told you he was in jail?

21 **A.** He sent his nephew.

22 **Q.** His nephew told you what again?

23 **A.** That his uncle had sent him to tell me what was
24 happening and that he had to take me to Fabiola's house.

25 **Q.** And who is Fabiola?

1 **A.** His nephews called her aunt.

2 **Q.** Okay. Was she, in fact, their aunt?

3 **A.** I always thought she was their aunt.

4 **Q.** Okay. What happened then when the nephew showed up?

05:02:57 **A.** I had to leave the apartment where he had taken me
6 when I arrived in Mexico, and they told me I had to go
7 live in Fabiola's apartment. She is the one who told me
8 everything I had to do.

9 **Q.** What was everything you had to do?

05:03:31 **A.** Can you repeat the question?

11 **Q.** You said Fabiola told you everything you had to do.
12 What was it that you had to do?

13 **A.** That Gerardo had said I needed to work at a bar and
14 become a prostitute so that I could get all the money that
05:03:59 15 he needed because working at a restaurant I wasn't going
16 to make enough money to help him. She taught me, and she
17 showed me the details of what I had to do.

18 **Q.** What was it you had to do? I know it's embarrassing.
19 I'll be as brief as I can. Okay. What was it that you
05:04:31 20 had to do?

21 **A.** She taught me how to open a condom package, how to put
22 it on, what position I had to take; and she taught me
23 other positions using which I could make more money. She
24 told me how much I had to charge.

05:05:07 **Q.** How much did you have to charge, ma'am?

1 **A.** \$65.

2 **Q.** After she taught you the tools, the tricks of the
3 trade I guess, where did you go work?

4 **A.** The first place where I was taken was La Costenita.

05:05:36 5 **Q.** And how long did you work there?

6 **A.** The truth is I couldn't tell you exactly the time that
7 I was working there.

8 **Q.** Okay. Let me ask you this: How old were you at the
9 time you started working at La Costenita?

05:05:59 10 **A.** I was still 15.

11 **Q.** Okay. Did you also work at Las Palmas?

12 **A.** Yes.

13 **Q.** And from what time to what time would you work at Las
14 Palmas?

05:06:14 15 **A.** It was after we would leave La Costenita. It was
16 really late.

17 **Q.** If I were to tell you that you worked at Las Palmas
18 from May of 2005 to July of 2005, would that be the
19 approximate times and dates that you worked?

05:06:34 20 **A.** Yes.

21 **Q.** And how old would you have been during that time?

22 **A.** 15.

23 **Q.** From what time to what time would you work at Las
24 Palmas?

05:07:08 25 **A.** It was the wee hours. I couldn't tell you exactly.

1 Sometimes when they closed La Costenita they would take us
2 there.

3 **Q.** And what time would they close La Costenita?

4 **A.** I don't remember.

05:07:27 5 **Q.** Nonetheless, you would work at La Costenita and then
6 be taken to Las Palmas?

7 **A.** Yes.

8 **Q.** Who hired you there at Las Palmas?

9 **A.** More than anything, I was really directed by Fabiola.
05:08:00 10 She received orders, and I just did what I was told.

11 **Q.** And do you know who Fabiola would receive the orders
12 from?

13 **A.** Gerardo Salazar.

14 **Q.** El Gallo?

05:08:17 15 **A.** The Rooster.

16 **Q.** So you arrived at Las Palmas and you just --
17 everything was arranged by the time you got there?

18 **A.** Yes.

19 **Q.** How much did you charge at Las Palmas?

05:08:33 20 **A.** The same, \$65. And she told me that sometimes if they
21 didn't accept that amount I could go for \$50.

22 **Q.** And when you worked at Las Palmas, were you still an
23 illegal, an undocumented person in our country?

24 **A.** Yes, that's correct.

05:09:09 25 **Q.** On a typical Saturday night, how much do you think you

1 would make at Las Palmas, approximately, if you know or if
2 you remember?

3 **A.** I don't remember.

4 **Q.** Let me ask you this: Why did you -- why did you
5 decide to work as a prostitute?

6 **A.** I didn't decide. I had no option.

7 **Q.** Explain that to the members of the jury, please,
8 ma'am.

9 **A.** Gerardo Salazar, The Rooster, threatened to kill my
10 parents if I left; and he also hit me.

11 **Q.** Where would he hit you, ma'am?

12 **A.** He would kick me. He would -- he would -- he hit me
13 wherever on my body and one time with a belt and with the
14 buckle of the belt once he hit me on my back and he
15 scratched me.

16 **Q.** Did you ever see a person by the name of Tencha there
17 at Las Palmas?

18 **A.** No. They wouldn't let me talk to anyone.

19 **Q.** How was it that you were able to escape from Las
20 Palmas?

21 **A.** I did not continue prostituting myself, thanks to the
22 officers who arrived there one day and took me out of
23 there.

24 **Q.** And where was it that they took you out of there? Was
25 it La Costenita where they rescued you?

1 **A.** Yes, that's correct.

2 **Q.** Did the fellow sitting behind me have anything to do
3 with you being rescued?

4 **A.** Yes, that's correct.

05:12:28 5 **Q.** Edwin?

6 **A.** Edwin.

7 **Q.** How old were you when Edwin rescued you?

8 **A.** I was already 16.

9 **Q.** At the beginning did you tell Edwin the truth?

05:12:51 10 **A.** No.

11 **Q.** Why didn't you tell Edwin the truth?

12 **A.** At the beginning I only told him what Gerardo had told
13 me to say.

14 **Q.** And what was it that Gerardo had told you to say?

05:13:18 15 **A.** That I didn't know him, that I didn't know who he was
16 and that I should say I had another name.

17 **Q.** Let me -- let me stop you. The bottom line is Edwin
18 got you out of this situation working as a prostitute?

19 **A.** Yes.

05:13:48 20 **Q.** And you worked at Las Palmas as a prostitute?

21 **A.** Yes.

22 **Q.** When you were a minor?

23 **A.** Yes.

24 **Q.** The money that you made at Las Palmas, you didn't get
05:14:02 25 to keep that money, right?

1 **A.** Yes, that's correct. I didn't keep anything.

2 **Q.** How much would Las Palmas charge you for the use of
3 the room and the condoms there at Las Palmas?

4 **A.** Could you repeat the question?

05:14:28 5 **Q.** Yes. Let me ask it this way: Would you get charged
6 \$5 for a condom there at Las Palmas?

7 **A.** (No response.)

8 **Q.** Are you okay?

9 **A.** (Nodding head up and down.)

05:15:04 10 **Q.** Was there a charge for the use of the condoms there at
11 Las Palmas?

12 **A.** Yes.

13 **Q.** Do you recall how much the charge was for the use of
14 the condom at Las Palmas?

05:15:19 15 THE COURT: Do you want to take a short break?
16 Are we okay, or do you want to take a short break?

17 MR. PEREZ: Let's take a break, Your Honor.

18 THE COURT: All right. It's 5:15. We will take,
19 what, a 10-minute break.

05:15:30 20 MR. PEREZ: That's fine.

21 THE COURT: I think we are doing fine time-wise
22 today. Okay. I talked to the attorneys.

23 MR. PEREZ: Thank you, Your Honor.

24 THE COURT: All right. We'll take -- it's now
05:15:39 25 5:15. We'll see you at 5:25. Okay.

1 (Jury exited courtroom at 5:15 p.m.)

2 (Recess from 5:15 p.m. to 5:29 p.m.)

3 THE COURT: Okay. Let's call the jury back in,
4 please.

05:29:23 5 THE MARSHAL: All rise.

6 (Jury entered courtroom at 5:29 p.m.)

7 THE COURT: Be seated. All right. Go right
8 ahead.

9 MR. PEREZ: Yes, Your Honor.

05:30:28 10 Q. (By Mr. Perez) Ma'am, when you worked at Las Palmas,
11 were you an illegal alien at that time?

12 A. Yes.

13 Q. And when you drove -- when you went from La Costenita
14 to Las Palmas, were you taken in a vehicle?

05:30:55 15 A. Yes.

16 Q. And who were the people who actually drove the
17 vehicles to get you from La Costenita to Las Palmas?

18 A. Gerardo or his nephew.

19 Q. And you mentioned that there was a trick played on you
05:31:15 20 as far as him being in trouble and he wanted you to work?

21 A. Yes.

22 Q. Did he ever call you by telephone to communicate with
23 you?

24 A. Yes.

05:31:30 25 Q. What did he tell you on the phone?

1 **A.** If they had already told me what I have to do.

2 **Q.** What did he tell you that you were supposed to do?

3 **A.** What my job was going to be.

4 **Q.** What was your job going to be?

05:32:09 5 **A.** That Fabiola had said that he had told her that I
6 needed to go work as a prostitute.

7 **Q.** I want to show you what's been marked as Government
8 Exhibit No. 35a. Can you tell the members of the jury and
9 the Court what 35a is?

05:32:32 10 **A.** It's my birth certificate.

11 **Q.** What is the date of birth for your birth certificate
12 for you?

13 **A.** June 2nd, 1989.

14 **Q.** 1989?

05:32:50 15 **A.** Yes, sir, 1989.

16 **Q.** Okay. P-19, do you recognize the person depicted on
17 P-19?

18 **A.** Yes.

05:33:13 19 **Q.** Who is the person depicted? Who is the person
20 depicted on P-19?

21 **A.** XXXXXXX.

22 **Q.** And did she work at Las Palmas, as well?

23 **A.** Yes.

05:33:36 24 **Q.** Okay. And P-71, do you recognize what is depicted on
25 P-71?

1 **A.** Yes.

2 **Q.** What is depicted on P-71?

3 **A.** It's the way we would go in.

4 **Q.** Is that Las Palmas?

05:33:52 5 **A.** Yes.

6 **Q.** How about P-72? Were those the stairs going to the
7 second floor at Las Palmas?

8 **A.** Yes.

9 MR. PEREZ: I'll pass the witness, Your Honor.

05:34:13 10 MR. FAZEL: May I proceed, Your Honor?

11 THE COURT: Yes. Go right ahead.

12 MR. FAZEL: Thank you, Judge.

13 **CROSS-EXAMINATION**

14 BY MR. FAZEL:

05:34:18 15 **Q.** Ms. Ortega [sic], I have a few questions for you. I
16 know this is difficult. If you don't understand me, let
17 me know; and I'll slow down and repeat myself. Okay?

18 **A.** Okay.

19 **Q.** El Gallo recruited you to be a prostitute in Mexico,
05:34:37 20 correct?

21 **A.** Yes, that's correct.

22 **Q.** And El Gallo actually is a gentleman who has got
23 multiple family members that help him out in that kind of
24 work, correct?

05:34:49 25 **A.** Could you repeat the question?

1 **Q.** Sure. El Gallo is not just by himself. He has a lot
2 of family members that help him do what he did to you?

3 **A.** I didn't know that.

4 **Q.** But you know that now?

05:35:11 **A.** Yes.

6 **Q.** Now, when you arrived in Houston and you were told
7 that you have to prostitute for El Gallo because he was in
8 custody, do you remember telling us that?

9 **A.** Yes.

05:35:30 **Q.** Okay. Who told you that?

11 **A.** His nephew.

12 **Q.** What was his name?

13 **A.** I don't remember the name.

14 **Q.** Was there somebody else with him when he told you
05:35:46 15 that?

16 **A.** No.

17 MR. FAZEL: Judge, can I have this?

18 THE COURT: Yes. Hang on.

19 MR. FAZEL: Thank you.

05:36:09 20 **Q.** (By Mr. Fazel) Do you remember just a minute ago you
21 identified this person, this P-19? Do you remember that?

22 **A.** Yes.

23 **Q.** Haven't you testified before that she was with Ivan
24 when they told you that you have to prostitute yourself?

05:36:31 25 **A.** Would you repeat the question?

1 Q. Sure. Previously under oath haven't you stated that
2 this person was with Ivan when both of them told you that
3 you have to prostitute yourself?

4 A. I didn't say that she was with Ivan.

05:36:52 5 Q. You never said that under oath?

6 A. No.

7 MR. FAZEL: Judge, may we approach real quick?

8 THE COURT: Hold it a second. Let me get this.

9 (Proceedings held at sidebar.)

05:37:19 10 THE COURT: All right.

11 MR. FAZEL: Technical issue. I need your advice.
12 We just received this today.

13 THE COURT: What is it?

14 MR. FAZEL: It's a deposition of a witness on a
05:37:27 15 different case. Actually, El Gallo's case. I went
16 through it as quickly as I could, and this came up. We
17 don't have a Spanish translation of it. There is only one
18 part I want to point out. I can have the translator read
19 it. I can have her translate it for the witness and then
20 have her response.

21 THE COURT: You are going to say a deposition or
22 another proceeding or how are you going to do it?

23 MR. FAZEL: Just under oath. That's the way I do
24 it. I'll do it the way you want me to.

05:37:53 25 THE COURT: All right. Any problem?

1 MR. PEREZ: No problem with that.

2 MR. FAZEL: Do you want the translator to
3 translate for her?

4 THE COURT: Whatever you want. Whatever
5 boundaries. Whatever you think is best.

6 MR. MAGLIOLO: If he says this in the deposition
7 however you -- he speaks Spanish. However he wants to do.
8 We're good, Judge.

9 THE COURT: Whatever you want to do.

05:38:14 10 MR. MAGLIOLO: As long as it's fair to the jury.

11 (Proceedings concluded at sidebar.)

12 MR. MAGLIOLO: Just get a date of how long ago or
13 when it was.

14 MR. FAZEL: Yes, sir.

05:38:43 15 Q. (By Mr. Fazel) Ma'am, do you remember testifying on
16 April --

17 THE COURT: All right. Hold on. Let me turn
18 this back on. All right. Go on.

19 Q. (By Mr. Fazel) Do you remember testifying on April
05:38:49 20 the 25th, 2006, in a deposition?

21 A. Yes.

22 Q. Do you remember being placed under oath?

23 A. Yes.

24 Q. At that time, do you remember being asked, quote, "Did
05:39:09 25 you eventually begin working for -- as a prostitute for

1 Gerardo?"

2 And you responded, "Yes"?

3 **A.** Yes.

4 **Q.** "QUESTION: How did that come about?"

5 05:39:22 Answer by you, "Because before they told me that they
6 had caught Gerardo."

7 "QUESTION: Let me stop you for a moment. Who is
8 'they'?"

9 "ANSWER: Ivan and Marcela."

10 05:39:38 Wasn't that your answer?

11 **A.** I don't understand.

12 **Q.** Did you not just answer the way I just told you?

13 13 THE COURT: When you gave that statement in
14 2006 --

15 05:39:58 MR. FAZEL: Yes, sir.

16 16 THE COURT: -- is that what you said as he just
17 read? Do you want him to read it again?

18 18 THE WITNESS: Yes, please.

19 19 **Q.** (By Mr. Fazel) "QUESTION: Did you eventually begin
20 05:40:15 working for -- as a prostitute for Gerardo?"

21 21 "ANSWER: Yes."

22 22 "QUESTION: How did that come about?"

23 23 "ANSWER: Because before they told me that they had
24 caught Gerardo."

25 05:40:29 "QUESTION: Let me stop you for a moment. Who is

1 'they'?"

2 "ANSWER: Ivan and Marcela."

3 THE COURT: Is that correct? Is that what you
4 said, to the best of your memory?

05:40:44 5 THE WITNESS: Yes. There are many things I don't
6 remember.

7 Q. (By Mr. Fazel) Yes, ma'am. I understand that. Now,
8 let me ask you some questions. At Las Palmas -- I'm
9 sorry. Thank you.

05:41:04 10 At Las Palmas you were taken there by somebody who
11 worked for your pimp, correct?

12 A. Could you repeat the question?

13 Q. Yes, ma'am. When you stopped working at the first
14 cantina and you were going to the second cantina, somebody
05:41:26 15 -- either your pimp or somebody that worked for him --
16 would take you to the second cantina at Las Palmas,
17 correct?

18 A. Yes, that's correct.

19 Q. And you had no option whether -- it was not your
05:41:38 20 choice? They were taking you, correct?

21 A. Yes. I couldn't choose.

22 Q. They could take you to any cantina, correct?

23 A. Yes.

24 Q. Okay. Now, when you arrived at Las Palmas, somebody
05:41:59 25 had already set it up so you could work there, correct?

1 **A.** Yes. Yes.

2 **Q.** You were not involved in the conversation between
3 whoever did that and whoever they talked to at Las Palmas,
4 correct?

05:42:18 5 **A.** No.

6 **Q.** So you don't know what they said about you or your
7 age, correct?

8 **A.** No.

9 **Q.** Did you have a false identity that was given to you or
05:42:28 10 identification card that was given to you by your pimp?

11 **A.** Yes.

12 **Q.** That was given to you so that you would use it to show
13 people that you are actually older than 18, correct?

14 **A.** Yes.

05:42:43 15 **Q.** Now, when you were in Las Palmas, you were told by
16 your pimp how much to charge, correct?

17 **A.** Yes.

18 **Q.** And all the moneys that you obtained was taken back to
19 your pimp, correct?

05:42:58 20 **A.** Yes.

21 **Q.** If your pimp decided the next day -- let's say on
22 Monday you went to Las Palmas. Okay. The next day,
23 Tuesday, the pimp wanted you to go somewhere. You would
24 go somewhere else, correct?

05:43:21 25 **A.** I would be taken to Las Palmas only on weekends.

1 Q. I'm sorry. You're right. Let's say on Friday they
2 took you to Las Palmas. Okay. Are you with me?

3 A. (Nodding head up and down.)

4 Q. And Saturday they took you to another cantina. You
5 would go to that other cantina because they are the ones
6 that take you, correct? Is that correct?

7 THE COURT: Ask it again, please.

8 MR. FAZEL: Yes, sir.

9 Q. (By Mr. Fazel) Let's say on Friday they take you to
10 Las Palmas. I understand they have control of you. I
11 appreciate that. They take you to Las Palmas on Friday.
12 Are you with me?

13 THE COURT: Go on.

14 MR. FAZEL: Yes, sir.

15 Q. (By Mr. Fazel) On Saturday they decide to take you to
16 another cantina. It's up to them to make that decision,
17 correct?

18 MR. MAGLIOLO: Your Honor, the government will
19 stipulate that she would go wherever they took her.

20 THE WITNESS: I don't understand.

21 MR. FAZEL: I'll move on. I'll just move on.

22 THE COURT: They agreed to it. The government
23 stipulated. Go on.

24 MR. FAZEL: Yes, sir. I pass this witness, Your
25 Honor.

1 MR. PEREZ: I have no further questions, Your
2 Honor.

3 THE COURT: All right. Thank you. You may step
4 down. You are excused and free to leave.

05:45:05 5 Ladies and gentlemen, I have talked to the attorneys.
6 We are doing fine time-wise, relative to the estimate. No
7 the case is not over, and it will hold over a bit into
8 next week. But from what I hear from my staff, they seem
9 ahead of schedule.

05:45:24 10 So we will see you tomorrow to begin at 9:00 a.m.; and
11 as far as that goes, we're adjourned for the day. Thank
12 you and good afternoon.

13 THE MARSHAL: All rise for the jury.

14 (Jury exited courtroom at 5:45 p.m.)

05:46:02 15 THE COURT: All right. See you tomorrow.

16 (Proceedings concluded at 5:45 p.m. and continued in
17 Volume 5.)

18 Date: September 3, 2015

COURT REPORTER'S CERTIFICATE

19 I certify that the foregoing is a true and correct
20 copy of the transcript originally filed with the clerk of
court on September 3, 2016, incorporating redactions of
21 personal identifiers requested by Court Order, in
accordance with Judicial Conference Policy. Redacted
22 characters appear as a black rectangle in the transcript.

23 /s/ Laura Wells
Laura Wells, CRR, RMR

24

25